Medical intellectual honesty, the application of best of scientific evidence, and a commitment to continuous biomedical training and education are touchstones of quality medical schools. The Miller School of Medicine is committed to conduct business with full transparency, disclosing all conflicts of interests and acknowledging activities or relationships that could be perceived to be conflictive in nature. The School has in place one of the most proactive reporting systems in the nation using an easily accessible web hyperlink. All Healthcare Professionals shall abide by all University of Miami Conflict of Interest policies. In addition, the University of Miami Medical Group has adopted the following improvements in its policy that shall apply to all HealthCare Professionals and heath care industry representatives.

1. **BASIS OF PRACTITIONER/VENDOR INTERACTIONS**
   Relationships between Healthcare Professionals and Industry Representatives are intended to benefit patients and to enhance the practice of medicine. Interactions between industry representatives and practitioners and staff should be focused on informing healthcare professionals about products, providing scientific and educational information, and supporting medical research and education. These interactions usually occur to obtain information about new drugs in the formulary or for training and evaluation of equipment/devices. Industry representatives may interact with professionals in non-patient care areas, by appointment only. Representatives are not allowed in patient care areas, may not see patients or medical records, and may not attend rounds or surgery. One exception is that industry representatives may be allowed in patient care areas to provide training on devices or equipment, if appropriate patient authorization is obtained prior to the interaction, where applicable. The respective Clinical Chair must be notified of this exception. Industry Representatives are prohibited from using clinical areas and the University of Miami email system and addresses to inform practitioners/staff of industry sponsored events.

2. **PRESENTATIONS BY OR ON BEHALF OF A HEALTH CARE ENTITY** Presentations and discussions by Industry Representatives speaking on behalf of a company, whether on UM premises or not, must provide valuable scientific and educational benefits, defined as being evidence based and reflecting best practice standards. Inclusion of a Healthcare Professional's spouse or other non-healthcare professional guests is not permitted. UM faculty shall not participate, including attendance, in industry sponsored events and presentations which involve the promotion and marketing of products as the primary focus. Industry sponsored instruction in the use of new devices and techniques will require careful consideration and authorization by the Chair and the presentation of evidence of efficacy and alternatives as coincident to the participation in such instruction sessions.
3. **MEALS**

In connection with such presentations or discussions, occasional meals (but no entertainment/recreational events) may be offered so long as they: (a) are modest as judged by local standards; (b) occur in a venue and manner conducive to informational communication; and (c) provide scientific or educational value. Financial support for meals or receptions should be provided to the CME sponsors who in turn can provide meals or receptions for all attendees. A company also may provide meals or receptions directly at such events if it complies with the sponsoring organization's guidelines. Offering "take-out" meals or meals to be eaten without a company representative being present (such as "dine & dash" programs) is not permitted.

4. **FINANCIAL SUPPORT OF EDUCATIONAL OR PROFESSIONAL MEETINGS**

a. Continuing medical education (CME) or other scientific and educational conferences or professional meetings can contribute to the improvement of patient care and therefore, financial support from companies is permissible. Since the giving of any subsidy directly to a Healthcare Professional by a company may be viewed as an inappropriate cash gift, any financial support should be given unrestricted only to the department, division or similar administrative unit, and not directly to the conference sponsor, facilitator, or individual practitioners. When companies underwrite medical conferences or meetings other than their own, responsibility for and control over the selection of content, faculty, educational methods, materials, and venue belongs to the organizers of the conferences or meetings in accordance with their guidelines.

b. Financial support should not be offered for the costs of travel, lodging, or other personal expenses of non-faculty healthcare professionals (“non-faculty” refers to those not speaking or teaching at the event) attending CME or other third-party scientific or educational conference or professional meetings, either directly to the individuals attending the conference or indirectly to the conference's sponsor.

c. Meeting Attendance: Funding is not permitted to compensate for the time spent by Healthcare Professionals attending the conference or meeting. Honoraria are permitted only for CME accredited educational presentations.

d. Financial support for meals or receptions may be provided to the CME sponsors who in turn can provide meals or receptions for all attendees. A company also may provide meals or receptions directly at such events if it complies with the sponsoring organization's guidelines. In either of the above situations, the meals or receptions should be modest and be conducive to discussion among faculty and attendees, and the amount of time at the meals or receptions should be clearly subordinate to the amount of time spent at the educational activities of the meeting.

e. A conference or meeting shall mean any activity, held at an appropriate location, where: (a) the gathering is primarily dedicated, in both time and effort, to promoting objective scientific and educational activities and discourse and (b) the main incentive for bringing attendees together is to further their knowledge on the topic(s) being presented.
5. **CONSULTANTS**

a. Practitioners who provide consulting services, the scope of which is defined in advance in a written and signed contract, are permitted to be offered reasonable compensation for those services and to be offered reimbursement for reasonable travel, lodging, and meal expenses incurred as part of providing those services, as approved by the Chair, or by the Dean, in the case of a Chair, and in accordance with University policy. Compensation and reimbursement that would not be permitted in other contexts can be acceptable for bona fide consultants in connection with their consulting arrangements. Token consulting or advisory arrangements should not be used to justify compensating Healthcare Professionals for their time or their travel, lodging, and other out-of-pocket expenses. The written contract must specify the nature of the services to be provided, the amount of compensation and the basis for payment of those services. The following additional factors support the existence of a bona fide consulting arrangement (not all factors may be relevant to any particular arrangement):

   i. a legitimate need for the services has been clearly identified in advance of requesting the services and entering into arrangements with the prospective consultants;

   ii. the criteria for selecting consultants are directly related to the identified purpose and the persons responsible for selecting the consultants have the expertise necessary to evaluate whether the particular healthcare professionals meet those criteria;

   iii. the number of healthcare professionals retained is not greater than the number reasonably necessary to achieve the identified purpose;

   iv. the retaining company maintains records concerning, and makes appropriate use of, the services provided by consultants;

   v. the venue and circumstances of any meeting with consultants are conducive to the consulting services and activities related to the services are the primary focus of the meeting, and any social or entertainment events are clearly subordinate in terms of time and emphasis.

b. Non-faculty and non-consultant attendees may not accept honoraria, travel or lodging expenses to attend company-sponsored meetings. Participation in interactive sessions is not considered consulting.

c. The UMMG consulting policy should be reviewed to be certain that professional income is properly designated. UMMG policy states:

   i. Consulting agreement income is defined as income received for providing advice or services to a company, agency or individual for the benefit of that company, agency or individual. Consulting consists of providing a service or advice rather than giving a prepared talk or presentation;

   ii. Honorarium is defined as payment for presentation of an educational talk, speech, academic presentation or panel discussion only. The honorarium may include travel expenses and is generally given on a per speech or event basis. Payment for giving advice to a particular individual, agency or company in response to a specific question or questions is not considered an honorarium. Payment for the presentation or dissemination of scientific knowledge and information to an audience comprised of various individuals and companies can be considered an honorarium.
6. **EDUCATIONAL PRESENTATIONS**

To ensure that our faculty members are not disseminating biased information with a UM faculty association, University of Miami Miller School of Medicine faculty will not participate in industry sponsored speakers bureaus or promotional presentations in which content (syllabus, slide decks, program outlines, bibliography, etc) is provided by the sponsor, even if only for a portion of the presentation, for the purposes of marketing or promotion. Faculty will only participate as speakers in educational presentations sponsored either directly or indirectly by health care entities if the events are CME accredited or if the content of the presentation(s) meets CME accreditation standards as determined by a peer review panel under the direction of the UMMG Chief Medical Officer.

Individuals who actively participate in those activities shall follow these guidelines:

a. The contracts for these services are reviewed and endorsed by the appropriate clinical department chair and/or division chief;

b. The UMMG Executive Committee may review any unresolved discrepancies that are requested to the Chief Operating Officer.

a. Financial support by industry is fully disclosed at every opportunity.

b. The meeting or lecture content is determined by the speaker and not the industrial sponsor;

c. The lecturer will provide a balanced assessment of therapeutic options and will promote objective scientific and educational activities and discourse;

d. UM practitioner is not required by the company sponsor to accept advice or services concerning teachers, authors, or other educational matters including content as a condition of the sponsor’s contribution of funds or services;

e. Gifts of any type will not be accepted.

f. Time spent in preparing and delivering the lectures does not impair the UM physician’s ability to fulfill Departmental responsibilities;

g. The lecturer explicitly describes all his or her related financial interests (past, existing, or planned) to the audience;

h. The lecturer makes clear to the audience that the content of the lecture reflects the views of the lecturer and not UMMG or UM;

i. Practitioners should not facilitate the participation of UM trainees in industry-sponsored events that fail to comply with these standards;

j. The use of UMMG or UM name in non-UM events is limited to the identification of the individual by his or her title and affiliation.

k. UM physicians’ names and likenesses are not allowed to appear in marketing materials for the sponsor or the sponsor’s products, or to participate in activities intended for the sole purpose of their promotion.

l. As a condition of their U Health appointment, paid Voluntary Faculty will comply with this policy. Unpaid Voluntary Faculty will comply with this policy at any time that they are on the premises of any U Health facility and while attending any U Health sponsored event. Unpaid Voluntary Faculty also will not use their U Health position, affiliation or University of Miami title while participating in activities not allowed by this policy. Any exceptions must be granted by the appropriate department Chair or other similar responsible authority. Confirmed failure to comply with the provisions of this policy will result in termination of the Voluntary faculty appointment.
7. SCHOLARSHIPS AND EDUCATIONAL FUNDS
Financial assistance for scholarships or other educational funds to permit medical students, residents, fellows, and other healthcare professionals in training to attend carefully selected educational conferences or to sponsor any part of their training may be offered, so long as the selection of individuals who will receive the funds is made by the academic or training institution and the funding is provided to the department or division, with no direct support to the trainee(s). "Carefully selected educational conferences" are generally defined as the major educational, scientific, or policy-making meetings of national, regional, or specialty medical associations.

8. GIFTS, EDUCATIONAL AND PRACTICE-RELATED ITEMS
Items primarily for the benefit of patients may be offered to healthcare professionals if they are not of substantial value.
   a. Items should not be offered on more than an occasional basis, even if each individual item is appropriate.
   b. Items intended for the personal benefit of Healthcare Professionals may not be offered or accepted.
   c. Payments in cash or cash equivalents (such as gift certificates) shall not be offered to Healthcare Professionals either directly or indirectly, except as compensation for bona fide services (as described in parts 4 and 5).
   d. Research Grants: All grants should be made in accordance with institutional guidelines and only through clearly defined agreements.

9. PRODUCT SAMPLES
No Samples of drugs, medical devices, or any other products may be accepted by UM Miller School of Medicine faculty, staff or students under any circumstances and will not be permitted in any School of Medicine facilities.

10. INDEPENDENCE OF DECISION MAKING
No grants, scholarships, subsidies, support, consulting contracts, or educational or practice related items can be provided or offered to a Healthcare Professional in exchange for prescribing products or for a commitment to continue prescribing products. Nothing should be offered or provided in a manner or on conditions that would interfere with the independence of a Healthcare Professional's prescribing practices.

   a. Purchasing/Formulary Decision-Making: If an employee is involved with making a purchasing or formulary decision, and if either the employee, his or her family, partners, or other individuals with whom they have a personal relationship have received a gift or compensation from or have any other financial interest in the business being considered, the employee is required to disclose the conflict. The employee may then provide evidence and their insight regarding the product or service, but have no vote in the purchasing or formulary decision.
b. **Family and Personal Relationships – Interaction with Industry:** Faculty/staff must not use their official University position(s) or influence for further gain or advancement for themselves, their families, partners, or other individuals with whom they have a personal relationship.

c. **Ghost Writing:** Is not permitted. All materials produced for publication or presentation will be developed by the author. Practitioners shall only use information from industry with review and modification, as required.

11. **VISITOR REGISTRATION FOR INDUSTRY REPRESENTATIVES**
Procedures for registration of Industry Representatives are established in the U Health Vendor Policy.

12. **ENFORCEMENT FOR INDUSTRY REPRESENTATIVES**
Industry Representatives who do not adhere to this Policy may lose their privileges to visit any/all U Health facilities.

13. **DISCLOSURE / REPORTING**
The University has in place a systematic, web-based reporting system. All faculty are required to completely disclose any and all relationships, including financial, with outside entities, or to affirm having no relationships. This requirement is absolute and reports will be generated to identify individuals who have not complied with full disclosure. These reports will be forwarded to the Dean and respective chairs who will address the discrepancies with the individual non-compliant faculty. Consequences will result from lack of compliance, including but not limited to the provisions of the enforcement section (see below).

14. **EXCEPTIONS**
Any exception to any provision of this policy requires review by the departmental chair. The chairs are empowered to review special cases presented by individual faculty to identify whether an exception is warranted and can be made while sustaining the fundamental principles of intellectual honesty and avoidance of bias.

15. **ENFORCEMENT FOR UM PRACTITIONERS AND STAFF**
Deviation by UM practitioners and staff from this policy will be addressed in the following manner:
1. Unintentional and minor deviation from policy
   **Action:** Verbal reprimand from department chair or delegated supervisor

2. Subsequent unintentional deviation from policy
   **Action:** Written reprimand from department chair and warning that any further infractions would result in a fine.

3. Intentional or flagrant or repeated offenses including false reporting of no participation in outside activities.
**Action:** Minimum fine of 5% of monthly salary, based on previous 12-month average. Higher amounts may be imposed if deemed appropriate by the nature of the infraction.

4. Additional intentional or flagrant or repeated offenses; or significantly egregious offense
   **Action:** Termination from medical staff, including relinquishment of clinical privileges or termination from employment, as deemed appropriate

The department chair will be accountable for enforcing the policy when violations occur within the department. The department chair may request recommendations from the UMMG Executive Committee on which sanctions may be most appropriate as individual issues arise. The Dean is ultimately responsible for ensuring that the chairs enforce the policy.