

Summary of COI Policy Changes Effective 1/1/12

1. Definitions

- Sentence added to definition of “Conflict of Interest”
 - A conflict of interest depends on the situation, and not on the character or actions, of the individual.

- Definition of gift added
 - “Gift” is defined as any item, product, or service, regardless of the nature, purpose, or value. The term includes, but is not limited to, pens, notepads, post-its, coffee mugs, calendars, refrigerator magnets, and other promotional items; cash; medication or product samples; vouchers or coupons; food and drink, except in the limited circumstances described in Section I) B); entertainment such as tickets to events, golf, and other sports outings; hotels, transportation, and other travel expenses, except in the limited circumstances described in Section I) C); stock, equity, and other ownership interests; and discounts on products or services.

- Definition of speakers’ bureau added
 - “Speakers’ Bureau” involves a situation in which an employee provides services as a speaker for industry and the arrangement has any of the following characteristics:
 - the company has the contractual right to dictate or control the content of the presentation or talk
 - the company creates the slides or presentation material
 - the employee is expected to act as the company’s agent or spokesperson for the purpose of disseminating company or product information

2. Purpose and Scope

- Sentence added to last paragraph in section
 - Outside professional relationships can result in conflicts regarding time and energies which may represent conflicts of commitment.

3. Core Values

- New bullet added
 - University resources are acquired and maintained to carry out the education, research, patient care, and public service missions of the University. Except for insignificant and incidental use, an employee may not use University resources for non-University purposes. If a question arises regarding what constitutes other than insignificant and incidental use, the employee should consult a supervisor for clarification.

4. Section I) Gifts

- B) Meals (section rewritten)
 - Industry-supplied or supported food or drinks are considered personal gifts and may not be accepted by faculty, staff, trainees, and departments or divisions on-campus or off-campus, except in any of the limited circumstances listed below:
 - 1) if provided in connection with attendance at programs compliant with the Accreditation Council on Continuing Medical Education (ACCME) Standards for Commercial Support or other accrediting bodies
 - 2) as a reasonable and necessary travel expense associated with services rendered in accordance with Section V of this Policy (i.e., approved consulting activity)
 - 3) if provided in connection with attendance at scientific or professional society meeting events open to all meeting attendees
 - 4) if provided at UI Health Care events, meals, snacks, or refreshments are allowable only when purchased through a UI Health Care department, division, or Foundation account
- C) Travel Expenses (new section)
 - Employees may not accept travel funds from industry, except for legitimate reimbursement of reasonable and necessary travel expenses in any of the following circumstances:
 - 1) to provide services rendered in accordance with Section V of this Policy (i.e., approved consulting activity)
 - 2) as described in Section I) H)
 - 3) as described in Section IX
- D) Educational Scholarships or Educational Events, Training, Visiting Professorships, and GME Stipends
 - “for the purchase of textbooks” may be included in requests for unrestricted grants and gifts
- E) Medical or Educational Equipment, Supplies, Resources, or Programming (second bullet rewritten)
 - Departments may accept gifts of textbooks, medical journals, or educational devices to be used in skills laboratories, if they do not contain promotional pages or logos
- G) Drug Samples (added link to information on pharmaceutical companies' assistance programs)
 - UI Health Care staff may help patients apply for pharmaceutical companies' assistance programs; the

[Medication Management Policy](#) provides more information regarding this.

- H) Training Assistance (first bullet rewritten)
 - Training on equipment or devices cannot be provided at industry expense unless the training is specifically included in the contract under which the equipment or device is acquired. This applies to both on-site training, which may include food or meals brought on-site, and travel expenses for off-site training.

5. Section II) Services Provided to Professional Organizations and Academic Institutions (first bullet rewritten)

- Outside professional service activities provided to professional organizations and/or academic institutions are a normal expectation of employees at an academic medical center. Participation in, and receipt of compensation for, these activities is allowed and generally does not require disclosure or an approved consulting contract.

6. Section V) Industry Compensation

- A) Consulting Expertise (second bullet rewritten)
 - Prior to executing a consulting contract and engaging in consulting activity, the faculty/staff member or trainee must submit the agreement to his/her DEO or manager/supervisor, as applicable, for approval of the consulting activity (faculty members who are the DEO should submit the contract to the Dean of the CCOM for approval of the activity). When the DEO or manager/supervisor has approved the activity, the contract must be submitted to the VPMA/COI Office for review and approval.
- A) Consulting Expertise (new bullet added)
 - Employees may not accept payment, gifts or other benefits, in return for completing evaluations or surveys developed by a business entity unless this activity meets the requirements for consulting agreements.
- B) Speaking and Training for Industry (new bullet added)
 - Presentations or training in which the primary purpose is to promote company products is prohibited.

7. Section VII) Site Access and Industry Displays

- Further clarification to requirements for industry displays
 - Compliance with the UIHC Vendor Policy (e.g., no displays in patient areas, or at patient/family educational events)

8. VIII) Continuing Medical Education

- Added link to ACCME Standards
 - All CME activities sponsored by the Carver College of Medicine must be in compliance with [ACCME regulations, requirements, standards, and guidelines](#).

9. IX) Research

- First bullet changed
 - Conflict of interest in research is governed by the University of Iowa's Policy on Conflicts of Commitment and Interest, Operations Manual II-18.6, available at <http://www.uiowa.edu/~our/opmanual/ii/18.htm>.
University of Iowa Health Care employees who are also engaged in research are governed by both this policy and the University of Iowa's Policy on Conflicts of Commitment and Interest, Operations Manual II-18.6.