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| <b>Approved:</b>  | <b>Dr. D. Gregory Chadwick, Dean</b> | <b>Reviewed/Revised:</b> |                  |

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**Title:**            Industry Involvement in SoDM Education, Service and Research Activities

**Purpose:**        The purpose of this document is to describe how external entities may support the School of Dental Medicine's education, research and service activities. The core principles involved in this document are derived from the proposed ADEA Faculty Code of Conduct and the ADA Principles of Ethical Behavior. Policies of the East Carolina University are essential in interpreting all standard operating procedures developed for the School; this document is intended to supplement and complement such ECU policies.

**General Principles:**

1. An overriding goal of these guidelines is to increase transparency respecting industry interactions and to effectively manage conflicts of interest created by these interactions.
2. The caregiver's primary responsibility is to the patient.
3. Research must be free of any potential for bias.
4. It is appropriate for there to be interactions between industry and faculty, residents, students and staff. The boundaries of those interactions must be clearly delineated and continually monitored.
5. The goal of these guidelines is to ensure all individuals are aware of their responsibilities with regard to industry relations. To that end all faculty, residents, students and staff should have specific instructions tailored to their roles in appropriate academic-industry interaction.
6. The institution and individuals are accountable for their actions. These standard operating procedures apply to all ECU SoDM personnel. This document is supplemental to, and does not supersede, the ECU policy regarding the disclosure of outside activities, financial interests and conflict of interest, which is applicable to all ECU employees.

**Industry Presentations and General Guidelines:**

1. It is appropriate for the School to participate in industry-sponsored events. However, such participation should not and does not imply endorsement by the School.
2. The administration, faculty or department, or a recognized student organization may sponsor industry presentations at the School. Student organizations must solicit faculty input and appropriate approval prior to pursuing School- or industry-sponsored educational events.
3. Full disclosure of corporate sponsorships and/or industry relationships must occur prior to any presentation.
4. Specific faculty may invite industry representatives to make presentations, if the faculty member wishes to include such a presentation as part of the curriculum, in a specific course module.
5. Otherwise, industry representatives wishing to make presentations to students must submit a Vendor Approval Form (VAF) to the Office of Student Affairs for review.

6. A review committee comprised of faculty, and including student representation, will review VAF submissions and select presenters to ensure that the information presented is balanced, unbiased, and educationally appropriate, and supplements the curriculum.
7. Based on the outcome of the faculty review process, the Office of Student Affairs will extend invitations for industry representatives to make presentations to students. The Office of Student Affairs will schedule and coordinate such presentations.
8. A responsible faculty member must be present for the presentation to ensure that the content is presented in a balanced and unbiased manner.
9. Vendors may distribute gifts (e.g., products or devices) of a nominal amount to all students for educational and product comparison purposes.
10. Vendors may not directly provide refreshments for events. However, industry may make a contribution to the SoDM via an unrestricted educational grant. In such instances, it would be permissible for a placard to be displayed, indicating that X is providing funding for refreshments.
11. Industry off-site sponsored activities that include food and refreshments are discouraged unless the SoDM sanctions the activity.

### **On Site Access by Industry:**

On-site access by industry is restricted to areas otherwise open to the public. All industry representatives are required to register with the Office of Clinical Affairs. At that time, each will receive a lanyard, identifying that they have registered. Failure to register shall result in penalties up to, and including denial of access. Access to patient-care areas, faculty offices, and other non-public areas may be permitted when industry presence is necessary for educational purposes, product demonstration, or “vendor fairs”.

Representatives who have access to patient care areas will need to complete HIPAA for vendors training found at: <http://www.ecu.edu/cs-dhs/hipaa/privacy/training.cfm>.

Representatives will be required to present a training completion certificate and completed and signed Confidentiality Statement at the time of registration with the Office of Clinical Affairs.

### **Industry Support:**

1. Gifts must primarily benefit patients and have educational value. Gifts (e.g., promotional materials and product samples) intended for patients must not have the appearance, ability, or perception of influencing patients or providers as such influence is prohibited by Federal laws. Samples of dental products such as toothpaste, toothbrushes, etc. are acceptable for patients. There can be no inherent expectation in return for such support.
2. Awards, travel funds, funds to support academic activities, scholarships and gifts are permissible if they specify the purpose of the educational, programmatic, or research activities and is properly administered by ECU and SoDM.
3. When School-sponsored events take place, industry support is permissible if support is recognized on all printed materials and acknowledged at the beginning of presentations.
4. Neither pre-doctoral nor postdoctoral curriculum content may be influenced by industry. Reference to specific corporate branding must be presented in an unbiased manner.
5. Both School and industry representatives must be continually sensitive to purchasing guidelines and ensure that no undue influence is placed on the respective School's purchasing agent. This is especially important in purchasing decisions made in the clinical pre-and post-doctoral, and faculty practice environments.
6. Faculty and staff involved in industry-supported speaker bureaus, advisory panels, and

consulting should comply with University of North Carolina Guidelines at <http://www.northcarolina.edu/legal/index.htm>, and with the University's guidelines on [External Professional Activities](#).

7. Ghostwriting is not acceptable.
8. Industry representatives should contact the Associate Dean for Clinical Affairs for clarification of policies.

#### **Industry Supported Research:**

All industry-sponsored research should follow guidelines and policies developed by the ECU Division of Research and Graduate Studies. Investigators should comply with research ethical guidelines and complete respective ECU conflict of interest documentation in a timely manner. All issues are to be referred to the Associate Dean for Research in the School of Dental Medicine.

#### **Philanthropy:**

Gifts of a philanthropic nature from industry to the School may be accepted by the Dean in consultation with an appropriate department chair or associate/assistant dean based on the congruence of the donor's corporate mission with the mission of the School. Whenever there is ambiguity in this regard, the final determination shall be made by the Dean. Anticipated gift arrangements will also be reviewed with the School's Director of Development.

#### **Continuing Education (CE):**

Dental continuing education arrangements will follow American Dental Association Continuing Education Recognition Program (CERP) guidelines as related to industry relationships.

#### **Compliance:**

For questions of general industry conflict, the Associate Dean for Clinical Affairs should be consulted. For questions of conflict related to industry-supported research, issues should be discussed with the Associate Dean for Research. The respective associate dean will provide oversight of compliance through monitoring of these policies and make determinations of violation in consultation with the Dean. The School's faculty, residents, students, and staff who do not comply with these policies are subject to disciplinary action as defined in University policies on conflict of interest.

