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Policy/Guideline Custodian: Associate Dean

of Clinical Affairs and Quality Category: Operations-Clinical

Title

Policy for Industry Relations

Policy

Policy Statement

Provide clarification of relationships between faculty, staff, residents and students in managing situations that may generate real and/or perceived conflicts of interest with industry.

PROCEDURES:

Industry Presentations and General Guidelines:

- 1. Full disclosure of corporate sponsorships and/or industry relationships must be present prior to any presentation.
- 2. Presentations must include a disclosure regarding any conflict of interest. It is preferable that a faculty member must be present and review content prior to the presentation to ensure that the content is presented in a balanced and unbiased manner.
- 3. When industry sponsored events take place, UFCD involvement is permissible as long as there is no perceived endorsement by the college by the nature of participating in the event. Presentations by industry on site must be sponsored by the administration, faculty/department, or recognized student organization. Student organizations must have faculty advisor input and approval prior to engaging in an invitation for either a college- or industry-sponsored educational event. Industry supplied food and refreshments are unacceptable unless purchased through unrestricted grants.
- 4. Industry off-site sponsored activities that include food and refreshments are discouraged unless funded through unrestricted grants.
- 5. 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 Clinical Administration office. At that time, each will receive a lanyard that will identify that they have registered. Failure to register shall result in penalties up

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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 that have access to patient care areas will need to complete HIPAA training.

Industry Support:

- Gifts must primarily benefit patients and have educational value. Gifts intended for
 patients must be limited to less than \$10.00 (Federal law prohibits influencing a
 patient to seek a provider by providing gifts). Samples of dental products such as
 toothpaste, toothbrushes, etc. are acceptable for patients. There can be no inherent
 expectation in return for such support. Small gifts are banned for faculty, staff,
 residents and students.
- 2. Awards, travel funds, funds to support academic activities, and scholarships are permissible if free of conflict of interest and must specify the purpose of education. Travel covered by industry support is only allowed after approval and with documented educational purposes. Scholarships funded with industry support are provided through unrestricted grants with the program selecting the awardee.
- 3. Industry supplied instrumentation, supplies, software, and textbooks are discouraged without contractual purchase and/or through the process of an educational unrestricted grant.
- 4. When college sponsored events take place, industry support is permissible if support is recognized on all printed materials and acknowledged at the beginning of presentations. Industry support of guest speakers must be through unrestricted grants; UFCD programs must select the guest speaker. Use of speaker bureaus and consultants is governed by University of Florida guidelines.
- 5. Both pre- and post-doctoral curriculum content cannot be influenced by industry. Reference to specific corporate branding must be presented in an unbiased manner.
- 6. Both UFCD and industry representatives must be continually sensitive to purchasing guidelines and ensure that no undue influence is placed on the respective UFCD purchasing agent. This is especially important in purchasing decisions made in the clinical pre-and post-doctoral, and faculty practice environment. All purchasing is subject to UF Procurement policies, practices and guidelines.
- 7. Faculty, staff and students involved in industry-supported speaker bureaus, advisory panels, and consulting should comply with UF Guidelines as outlined in Reference three (3) as well as UF policy for disclosure of outside activities. Ghostwriting is not acceptable.

A sponsoring faculty member must be assigned to all of these activities to ensure compliance. Industry representatives should contact the Associate Dean of Clinic Administration & Quality for clarification of policies.

Industry Supported Research:



All industry sponsored research should follow guidelines and polices developed by the University of Florida Division of Sponsored Research. Investigators must comply with research ethical guidelines and complete respective UF conflict of interest documentation in a timely manner. All issues are to be referred to the Associate Dean for Research in the College of Dentistry.

Philanthropy:

All gift agreements, including industry and individual gifts, are reviewed and approved by legal counsel at the UF Foundation. Gifts of a philanthropic nature from industry to UFCD 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 UFCD. Whenever there is ambiguity in this regard, the issue shall be decided by the dean.

Continuing Dental Education (CDE):

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

Compliance:

For questions of general industry conflict, the Associate Dean for Clinic Administration & Quality 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 UFCD faculty, residents, students, and staff who do not comply with these policies are subject to disciplinary action as defined in University policies in conflict of interest.

References

UFCD 1.08 Disclosure of Outside Activities Information

Contact Information

Policy Contact

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Important Dates



- Original Effective Date: June 25, 2009, Approver: Dr. Teresa A. Dolan, Dean
- Revised: July 2014, Approver: Dr. A. Isabel Garcia, Dean
- Reviewed and Revised: May 2023, Approver: Dr. A. Isabel Garcia, Dean

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