

III. Vendor Support for Health System Educational Events

Vendor support for Mount Sinai-sponsored educational events, whether held on campus or off-campus, will only be accepted in accordance with the following provisions:

✓ A. Deposit to General Fund

With the exception of CME events (see Section III-C of this policy), any vendor contribution must be in the form of a general educational grant paid directly to a School or Hospital fund. No direct payments may be made to any Mount Sinai faculty member, trainee, or employee. Mount Sinai shall retain exclusive responsibility for all aspects of educational events. Corporate sponsors may not make commercial exhibits, distribution of promotional materials or the inclusion of company representatives a requirement for support. A letter of agreement ([/file_source/ISMMS/Assets/About the School/Faculty-Resources/commercial_support_agreement.doc](/file_source/ISMMS/Assets/About%20the%20School/Faculty-Resources/commercial_support_agreement.doc)) outlining expectations and restrictions will be signed by both the department Chair and the vendor.

✓ B. Food and Beverages

Direct provision by vendors of food and beverages, or subsidies for food and beverages, is prohibited.

✓ **C. Continuing Medical Education**

Vendor support for accredited continuing medical education (CME) programs must be submitted in accordance with the policies and procedures of Mount Sinai's Page and William Black Post Graduate School for Continuing Medical Education. Vendor support for CME programs will be managed in accordance with the Standards for Commercial Support (<http://www.accme.org/requirements/accreditation-requirements-cme-providers/standards-for-commercial-support>) of the Accreditation Council for Continuing Medical Education (ACCME), including:

- Independence from commercial interests in course goals, content and methods
- Resolution of personal conflicts of interest
- Bias-free content and format
- Disclosures relevant to potential commercial bias
- Management of commercial promotion

✓ **D. Program Content**

Programs must have true educational value and can never be designed to influence purchasing decisions. The Standards for Commercial Support (<http://www.accme.org/requirements/accreditation-requirements-cme-providers/standards-for-commercial-support>) of the Accreditation Council for Continuing Medical Education (ACCME) are applicable to all educational events, whether or not they fall under the auspices of the Post-Graduate School; guidelines include:

- Curriculum content, faculty selection and program quality will be the sole responsibility of Mount Sinai department management and/or faculty involved in the event.
- Speaker selection and educational content will be at the discretion of the department.
- Guest speakers must sign a standard Disclosure Statement ([/file_source/ISMMS/Assets/About the School/Faculty-Resources/Disclosure Statement.doc](/file_source/ISMMS/Assets/About%20the%20School/Faculty-Resources/Disclosure%20Statement.doc)) indicating compliance with institutional conflict of interest policies.
- All presentations must be free of commercial bias for or against any vendor's products or services. Generic rather than trade names of drugs must be used at conferences.
- Vendor representatives may not address the audience unless specifically invited by the Mount Sinai event organizers.
- Promotional materials from commercial sponsors may not be displayed in the room before, during or after the activity.
- Vendors may apply for exhibit space outside the room(s) in which the educational event is held. The granting of such requests is at the discretion of the conference organizers and fees may be levied. In the event that exhibit space is approved, exhibitors will be subject to gift restrictions as described in Section I (</sites/MSSM/default/about/faculty-resources/handbook/institutional/vendors/introduction>) of this policy, as well as to the PhRMA Code (<http://www.phrma.org/about/codes-and-guidelines>).
- Refreshments, study materials, etc. should be appropriate to the event.

✓ **E. Acknowledgment of Vendor Support**

Commercial support may be acknowledged in printed materials, but specific products may not be mentioned.

✓ **F. Vendor Support for Trainees**

Vendor support can never be made directly to or earmarked specifically for an identified individual. Vendor support for trainee education, including salary support, must be in the form of educational grants to Mount Sinai.

✓ **G. Education and Training on Vendor's Own Products**

Vendor representatives from pharmaceutical, biotechnology and other industries may visit healthcare providers or researchers to talk about and demonstrate their new products. While generally acceptable as straightforward sales visits, an appointment is always required; representatives are not permitted on campus on a drop-in basis. Visits to health care providers must comply with Mount Sinai's policy on Medical Sales Representatives.

Sales representatives may not access any patient-specific information. They are not permitted in patient care areas unless they have: 1) completed all badging requirements as a Patient Care Area Vendor in the Mount Sinai Health System Vendormate System, including immunization requirements; and 2) been specifically requested by the Department to assist with a particular case, or have been issued a written appointment by the Department.

Refreshments and gifts from vendors, however modest, are prohibited during visits by representatives as described in Section II (</sites/MSSM/default/about/faculty-resources/handbook/institutional/vendors/gifts>) and Section III of this policy.

Scheduled appointments are required for vendor visits to train physicians, researchers or others in device use or new technologies.

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