University of Georgia College of Veterinary Medicine Policy on Corporate Interaction

Introduction
The University of Georgia College of Veterinary Medicine (UGA CVM) acknowledges that interactions between corporate entities and their representatives occur regularly between UGA CVM faculty, staff, house officers, and students (hereafter “personnel”). These interactions have the potential to educate UGA CVM personnel regarding therapies, medical devices, and diets that may be helpful to patients and clients of the UGA CVM and elsewhere. These interactions also prepare veterinary students for interactions they may have as veterinary practitioners after graduation. When interactions between corporate entities and students occur under the oversight of a UGA CVM faculty member or house officer, they may provide an opportunity to educate students on concepts such as conflict of interest, bias, and transparency in clinical practice and research. However, interactions between corporate entities and UGA CVM personnel also have the potential to introduce bias in clinical practice that may be harmful to patients or clients. Therefore, this document outlines UGA CVM policy on corporate interactions with UGA CVM personnel, with an emphasis on interactions between corporate entities and veterinary students.

The UGA CVM has established policies on faculty consulting, which may include consulting for corporate entities; thus consulting policies are not addressed in this document.

Background and overarching principles
Overarching principles that have been considered in development of this document are as follows:
1. The UGA CVM is committed to ensuring transparency in all dealings between UGA CVM personnel and corporate entities and their representatives.

2. In clinical practice, the primary responsibility of UGA CVM personnel is to the patient and client.

3. Research has shown that receipt of even small gifts from corporate entities can influence the clinical practice of physicians (PLoS Med 2012;7:1-22). It is likely that veterinarians are similarly influenced, but little research has characterized this.

4. Because of the current organization of veterinary practice, veterinarians in clinical practice are more likely than physicians to be required to interact directly with corporate representatives to make decisions regarding medications, medical devices, feedstuffs, and supplements that may be necessary for appropriate care of their patients. Therefore, within certain limits, interactions
between veterinary students and corporate entities and their representatives provide an opportunity for students to develop skills and knowledge to help them recognize and minimize bias and conflict of interest in their clinical practice that may arise from such interactions after they graduate.

5. Corporate entities and their representatives should not have undue influence on veterinary students. UGA CVM faculty staff should be aware of corporate interactions with veterinary students in the UGA CVM, and guidelines should be in place to ensure that interactions between corporate entities and UGA CVM veterinary students operate within appropriate limits.

6. All corporate entities should have equal opportunity to interact with students.

Representatives from corporate entities often make presentations to UGA CVM veterinary students. These presentations are generally intended to educate students regarding products or services provided by the corporate entity. Such presentations by nature are also promotional.

Although the majority of veterinary student education in the UGA CVM should come from faculty, staff, and house officers, it is acknowledged that there can be educational value in presentations by corporate representatives. For this to be the case, such presentations should contain no less than 90% background or supporting information that is not specifically promotional. Also, company affiliated speakers must conduct themselves in a professional manner and provide accurate information in their presentations. In addition, presentations must be made by speakers who are qualified to answer student questions related to veterinary medicine as directly relevant to the product or service.

Historically, corporate representatives wishing to make presentations to UGA CVM veterinary students have contacted the SCAVMA President-Elect, who has scheduled the presentations. Alternatively, students who are members of UGA CVM clubs may have worked with the SCAVMA President-Elect to schedule presentations. A large number of presentations are scheduled annually, particularly in August and September; requests have sometimes been made with as little as 2 days’ notice. This system can at times be excessively burdensome for the SCAVMA President-Elect.

Historically, multiple presentations have been made annually in the UGA CVM on similar subjects by different companies. For example, students may have the opportunity to attend as many as 5 one-hour presentations on heartworm preventatives. While all corporate entities should have equal access to students, “equal access” could lead to an expectation that students attend an unreasonable number of hours of presentations. Faculty or staff could help develop guidelines so that equal access is balanced with reasonable time demand of students.

Specific guidelines regarding behavior of the UGA-CVM community and corporate entities, as well as special circumstances related to medications and pet food are detailed below:

Guidelines for gifts and food intended for human consumption
**Definition of a gift**: free product intended for human use. Examples include, but are not limited to pens, note pads, backpacks, tote bags, toys, leashes, etc. These small gift items are not considered to be a source of significant concern as far as biasing students. The distribution of more substantial and potentially valuable gift items (i.e. textbooks) must be approved by the Corporate Interaction Committee. In addition, gifts of money, gift cards or traveler’s checks are strictly prohibited. This limitation does not pertain to scholarships or awards/sponsorships provided by corporate entities. Gift items should be only distributed on campus by student representatives at approved events including, but not limited to lunchtime seminars, product distribution day, student orientation, or other similar sanctioned event. Student representatives should remove any remaining items at the conclusion of the event. Sale or resale of the gift product is not permitted. Food and non-alcoholic refreshments provided by companies at on-campus corporate speaker presentations are greatly appreciated. Clean up and arrangement for trash collection is the responsibility of the student representative of the sponsoring entity. If a company does not have an onsite student representative, then the company itself or the student organization that invited or facilitated arranging for the company to speak must ensure the room is clean and available on time for the next scheduled use of that room.

**Guidelines for corporate sponsorship of educational events**
The CVM recognizes the importance of and appreciates corporate sponsorship of continuing education conferences, new student orientation and various CVM social events, which are essential in building the CVM community. Any advertisement (flyer, email, webpage) of these corporate sponsored events must be unambiguously identified as being sponsored by the specific company(s).

**Policy on corporate presentations to DVM students**
It is recommended that a small committee of faculty, staff, and students be established to evaluate all requests by corporate representatives to make presentations to students (hereafter, “Corporate Interaction Committee”). Members of this committee will be appointed by the Associate Dean for Academic Affairs. The Corporate Interaction Committee would evaluate requests monthly and then would approve or deny requests within a reasonable time (e.g., 2 weeks) of review. Corporate representatives wishing to make presentations and or donate products (see page 6) to UGA CVM students would complete a 1 page form (available on the UGA CVM website); information provided on the form would include:

For presentations:

1. title of proposed presentation
2. rationale for making the presentation to UGA CVM veterinary students
3. speaker’s qualifications
4. outline of presentation
5. food, gifts, or product to be provided to all attendees
6. agreement to comply with the UGA CVM Corporate Interaction Policy
7. sponsoring UGA CVM club is, if any
8. name and contact info of student representative, if any
For product distribution:
1. description of product
2. rationale for making product available to students
3. peer-reviewed references supporting product efficacy
4. agreement to comply with the UGA CVM Corporate Interaction Policy
5. sponsoring UGA CVM club, if any
6. name and contact info of student representative, if any

The purpose of having this committee review all requests for corporate presentations or product distribution to UGA CVM veterinary students is:

1. To provide a standardized and evenhanded system of ensuring that all corporate presentations made to UGA CVM veterinary students meet the guidelines outlined above (“Background and overarching principles”) for educational content and speaker qualifications;

2. To ensure that students are not subjected to an unreasonable number of presentations on similar subjects annually (with the definition of “reasonable” to be determined by the committee);

3. To provide a system for scheduling corporate presentations that is standardized, streamlined, timely, and not unduly burdensome on the SCAVMA President-Elect or other students; and

4. To provide a vehicle for faculty oversight of presentations made to students and for product distributed to students.

Members of the Corporate Interaction Committee must disclose all support they have received from corporate entities who may be applying to make presentations or distribute product.

While evaluation of the proposed presentation by the committee is intended to ensure a minimum level of educational content and speaker qualifications, obviously it is possible that the presentation actually given may not be consistent with the proposal submitted. To provide oversight of presentations, it is recommended that a UGA CVM faculty, staff member or house officer be asked to attend all corporate presentations and complete a short survey (to be developed by the committee) regarding content and speaker qualifications. If problems or concerns with the presentation were noted, the faculty/staff/house officer attendee would address the issues with the speaker, report back to the committee, and the committee would determine the appropriate course of action. Since attending corporate presentations could become burdensome for faculty/staff/house officer attendees, this system would require a large pool of participating faculty/staff/house officers (identified by the committee), so that no single person was needed to attend more than 2-4 presentations annually.

**Student behavior at corporate sponsored events**

Students who attend any corporate sponsored events should show proper respect by being attentive during the presentation. No computers or other work should be open during the presentation. If the company has provided food for the meeting/presentation, the students should
remain in the presentation after obtaining and consuming the food or beverage. Moreover, the students should stay through the entire presentation. Students entering late after the presentation has started, especially 4th-year students, who are participating in clinical rotations, should enter in the room in an unobtrusive manner. Companies who provide meals at their seminars often request that students RSVP prior to the event to insure that the appropriate amount of food is ordered without going over budget. Students who RSVP are expected to attend the entire seminar and should not leave out the back door after picking up food. Students who have not RSVP’ed for a seminar but would still like to attend a seminar should not take food until everyone who has RSVP’ed has had a chance to get food.

**Guidelines for student corporate representatives**

All students that are company representatives must register with the Office for Academic Affairs and the Corporate Interaction Committee. Company representatives or others who accept support from corporations may not be members of the Corporate Interaction Committee. Registration should include in writing (see attached form):

- The name of the student representative
- The company he/she is representing
- A brief description of the company
- Contact information for the student’s supervisor within the company
- The duties required of the student by the company
- Benefits for the student representative (including payment, travel, and other gifts)
- The process by which new representatives will be chosen

It is the responsibility of the student representatives to keep the above information, especially corporate contact information, up-to-date. The representative must also provide information on the lunches/dinners, wet labs, and donations the company provides to the CVM. The student representative is also responsible for ensuring that his/her company understands the guidelines and regulations in this document and complies with them when interacting with the College.

**Commercial Pet Food Industry Corporate Sponsorship Policy**

The UGA CVM recognizes that nutrition plays an important role in the management of all our patients, and that we have a responsibility to educate veterinary students about commercial and therapeutic pet food products. In addition, new pet food products are continually being developed and released, and it is important for students to have a working knowledge of this changing market in order to make informed decisions about patient management and to provide the most current and accurate information to clients. Pet food companies can provide educational information about nutrition and new products that can enhance or supplement information taught in the curriculum. The following are general guidelines for interactions between Pet Food Companies and UGA CVM students:

**Pet Food Company Presentations**

1. Company-affiliated speakers and presentations must be scheduled through the Corporate Interaction Committee, and will be approved and evaluated based on the guidelines above ("Policy on corporate presentations to DVM students").
2. Company-affiliated presentations to the entire student body shall be limited to one per Pet Food Company per semester. Exceptions may be made if an instructor requests that a specific Pet Food Company Representative speak to the students in their course or rotation.

3. Company-affiliated presentations must focus on nutrition-related topics.

**Pet Food Products**
Currently, pet food companies either donate their products or sell them at a reduced rate to UGACVM personnel. In a time of continually shrinking budgets, UGA CVM appreciates these contributions. The following are recommendations for policies pertaining to pet food products at UGACVM:

1. All companies should be given equal opportunity to make their products available for use at UGA CVM.

2. Pet food companies that offer a feeding program for pets of students and employees at UGACVM shall provide fair access to all personnel. It is not acceptable to exclude any one class of employees (for example, to allow faculty but exclude staff) from enrollment in a pet food program.

3. All therapeutic pet food products should be distributed under guidelines such as those already established for the Hill’s SCAVMA Feeding Program, which requires a prescription from the VTH or the Clinical Nutritionist for therapeutic diets. At no time should a Pet Food Company Student Representative order and distribute therapeutic pet food products at UGA CVM independent of UGA CVM veterinary oversight.

**Guidelines for distribution of non-pet food related products**
Products addressed here include pharmaceuticals (prescription and non-prescription drugs), or products related to animal health (e.g. shampoos). As mandated by law, the distribution of prescription pharmaceuticals must be through a licensed veterinarian, (i.e. faculty member). In order for these products to be distributed, the following the guidelines must be followed. Failure to follow these guidelines will result in a one-year suspension of a company’s right to distribute product.

1. To donate pharmaceuticals and products, companies (or their sanctioned representatives, including student representatives) must first submit a request to the Corporate Interaction Committee (see page3).

2. Only approved products may be provided or advertised on school grounds, or using the UGA list serve system. Furthermore, UGA email addresses (i.e. _@uga.edu) may not be used to advertise on or off-campus distribution until approval has been obtained.

3. For products to be distributed on-campus, an approved designated time must be scheduled for distribution. After distribution, all products must be removed from the designated distribution point (e.g. the student lobby). Remaining product will be confiscated by the Office of Academic
Affairs. For large amounts of product (i.e. heartworm prevention), product may be stored in a designated secure area on school grounds.

4. Alternatively, with prior approval, product may be placed in student mailboxes.

Consequences of policy non-compliance

Corporate representatives:
If a corporate representative fails to follow the established guidelines, the representative and their company will be placed on one year of probation. If any representative of the company fails to follow policy during the probation period, the company will be prohibited from making presentations or distributing product for 1 year. Future re-admittance into the UGA CVM will then be up to the discretion of the Corporate Interaction Committee.

Student representatives for companies:
If a student representative does not adhere to the guidelines for student representatives, they will be placed on one year of probation, with monitoring by the Corporate Interaction Committee and the Office of Academic Affairs. If during the year of probation he or she does not adhere to the guidelines, the Associate Dean for Academic Affairs will contact the company sponsor and inform them that the student representative will need to be replaced.

UGA CVM student clubs/faculty advisors:
If a UGA CVM student club does not follow the policy guidelines with regard to company sponsorship and presentations, the club will be given a warning and put on probation for one year. If the club fails to follow policy during the probation period, they will lose the right to utilize companies for sponsorship or speakers until new club officers are elected in the following year or as otherwise decided on by the Corporate Interaction Committee.

UGA CVM staff/faculty:
If a UGA CVM staff or faculty member does not follow the policies in this document, the Corporate Interaction Committee will evaluate the situation on a case-by-case basis, and will communicate with the Associate Dean for Academic Affairs and/or the Dean regarding an appropriate course of action.