



College of Veterinary Medicine

UNIVERSITY OF GEORGIA

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 inform veterinary students about externship and internship opportunities, and 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.

All corporations interested in interacting with UGA CVM students must first read the Policy on Corporate Interaction listed on the UGA CVM Website (<https://vet.uga.edu/student-life/student-clubs-and-organization/>). Corporation must agree to adhere to this policy if they wish to interact with students and sign this document on page 9 acknowledging their agreement to adhere to the CIC Policy. The signed policy must be returned to the CIC (ugascavmacic@gmail.com).

6. **Enrollment of new corporations will occur only during the first 3 weeks of September each year.** New corporations that miss the annual enrollment period must wait until the next open enrollment period to apply. Interested Corporate Representative should then contact the CIC Student Representative listed on this same link. The CIC Student Representative will contact the corporation and discuss the application process further.
7. **All Corporations seeking approval from the CIC must be willing to hire a veterinary student representative**, who serves as the person who facilitates all communications between the corporation and our students. Exceptions to this requirement include corporations that provide specific educational content in the DVM Curriculum, and corporations sponsored by a UGA CVM Club to give a lecture. In the latter situation, a Club Representative acts as the liaison between the company and UGA CVM and must abide by the CIC Policy while doing so.
8. All CIC approved corporate entities should have equal opportunity to interact with students, Interactions with students include those in which any UGA CVM resources are used during these interactions, whether the interaction occurs on-campus in-person, off-campus in-person or via video communications, such as Zoom, GoToMeeting, etc. UGA CVM resources include, but are not limited to electronic resources, such as listserves, ugmail, and social media sites affiliated with the UGA CVM, as well as physical facilities, such as wall space for posters, mailboxes, etc. Adherence to CIC Policy applies to all such interactions and require CIC approval prior to conducting these interactions.

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 given 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, prior to the existence of the Corporate Interaction Committee, corporate representatives wishing to make presentations to UGA CVM veterinary students have contacted the SAVMAC President-Elect, who has scheduled the presentations. Alternatively, students who are members of UGA CVM clubs may have worked with the SAVMAC President-Elect to schedule presentations. A large number of presentations are scheduled annually, particularly in August and September; and requests have sometimes been made with as little as 2 days' notice. This system can at times be excessively burdensome for the SAVMAC President-Elect. Such presentation requests are now made through the CIC by the student representative for a corporation or by UGA CVM Club representative.

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, toys, leashes, etc. These small gift items valued at less than \$5 are not considered to be a source of significant concern as far as biasing students and do not require CIC approval. The distribution of more substantial and potentially valuable gift items greater than \$5 in value (i.e. textbooks, backpacks, pet treats, etc) must be approved by the Corporate Interaction Committee. In addition, **gifts of money or gift cards are strictly prohibited.** This limitation does not pertain to scholarships or awards/sponsorships provided by corporate entities. Gift items should only be distributed by student representatives at approved on campus or off campus 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. This includes items displayed in the student lobby at the CVM or at the Station at the VMC. Sale or resale of the gift products are not permitted. Food and non-alcoholic refreshments provided by companies at on-campus corporate speaker presentations are greatly appreciated. During the COVID 19 Pandemic, food provided for meals must be prepackaged or box lunches. No buffet style meals. 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 student organization or faculty member who 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. Events occurring after 5 pm or on weekends must adhere to the “*Cleaning Policy for After Hours and Weekend Meeting or Events*”. This policy can be found on the UGA CVM Website under Student Life.

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. Student representatives for corporations 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). **This form must be filled out by a UGA CVM student, sponsoring CVM Club or faculty member.** Corporate representatives are not allowed to submit these requests. Information provided on the form must 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 (see Product Distribution Request below)
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
9. Date, time and room of presentation

For product distribution:

1. description of product and approximate value 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 or club member responsible for distributing the product to students

Requests submitted to the CIC for Presentations and/or Product Distribution must be submitted at least 3 weeks in advance of the scheduled event. This allows for the CIC to review the requests, follow-up with any questions or clarifications pertaining to the request or to notify the student that the request is incomplete and needs to be resubmitted once it is complete. Only after the request have been approved can the SAVMAC President Elect reserve a room or slot on the SAVMAC calendar for the event. All reservations will be made in the order they were submitted, and only one event can be scheduled at any one time. Should the student not be able to meet the three week timeline, they should first check with the CIC Student Representative on the committee before submitting a late request to determine if the committee can accommodate the late request.

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 SAVMAC 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 there is the possibility 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 corporate presentations. **For off-campus corporate presentations,**

including remote video communications, the invite must include the members of the committee. The student representative for the corporation can provide this information. If problems or concerns with the presentation are noted, the faculty/staff/house officer, or a student attendee would address the issues with the CIC for review. The CIC would determine the appropriate course of action. Since attending corporate presentations could become burdensome for faculty/staff/house officer attendees, UGA CVM students can also provide feedback on a presentation and report any problems to the CIC.

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 in-person presentations, and students must be respectful during the presentation. For remote presentations, the students must have their video component on their computers turned on and be attentive 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. Consequences for students who fail to adhere to these policies are outlined in SAVMAC's Suspension Policy.

Guidelines for student corporate representatives

All students that are company representatives must register their corporation with the Corporate Interaction Committee every semester. Students who fail to register their corporation with the CIC will not be allowed to schedule any presentations or other events for that corporation.

Registration should include in writing (see attached form):

- The name of the student representative (please include the names of all student representative for a corporation, not just the name of the student filling out the form).
- 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 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. The same overriding principal applies to other corporations, such as drug companies and corporate veterinary practices. Corporations can provide educational information about nutrition, drugs, or new products that can enhance or supplement information taught in the curriculum. Corporate Veterinary Practices provide students with externship and internship opportunities, as well as employment once they graduate. The following are general guidelines for interactions between Corporations and UGA CVM students:

Corporate Presentations

1. Company-affiliated speakers and presentations must be scheduled through the Corporate Interaction Committee, and they 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 company per semester. Exceptions may be made if an instructor requests that a specific Company Representative speak to the students in their course or rotation.
3. Company-affiliated presentations must focus on educational topics appropriate for that company and their speaker’s qualifications.

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 CIC approved 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 must be distributed under guidelines, such as those already established for the Hill's SAVMA 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 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 through means other than through the pharmacy, 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 or any UGA CVM resources. 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 or the station). 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 CIC will discuss the violation and give the corporation a chance to provide an opportunity to explain to the CIC why they failed to adhere to the agreed upon CIC Guidelines. One of 2 outcomes will occur as a result of this violation.

1. The company will be placed on a one-year probationary period. Further violation of the CIC guidelines during this probationary period will result in immediate suspension for one year from the date the second violation occurred..
2. The company will be placed on immediate suspension, at which time the company will be prohibited from making presentations, distributing product and any other informational materials to the UGA CVM students 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:

Student representatives for a corporation must read through the CIC Policy. 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.

I,
(name of person representing the corporation),

who is representing
(name of corporation)

hereby agree to abide by the policies stated in this document while interacting with UGA CVM Students.

Date: _____

Please email this signed document back to the CIC Student Representative listed on the following link: <https://vet.uga.edu/student-life/student-clubs-and-organization/>.