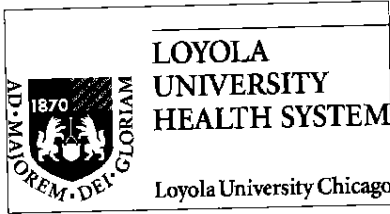


**LOYOLA UNIVERSITY MEDICAL CENTER  
ADMINISTRATIVE POLICY NUMBER: PS-13**



**Subject: PERMISSIBLE ARRANGEMENTS BETWEEN COLLEAGUES &  
VENDORS POLICY**

**Date Implemented: August 2005**

**Date Revised: September 20, 2005  
October 15, 2007**

**University**

**Administration Approval:**

Paul K. Whelton, M.B., M.D., M.Sc.  
President and Chief Executive Officer  
Loyola University Health System/  
Loyola University Medical Center  
Vice President for the Health Sciences  
Loyola University of Chicago

**Medical Center**

**Administrative Approval:**

Michael Scheer  
Senior Vice President, Chief Financial  
Officer and Treasurer  
Loyola University Health System  
Loyola University Medical Center

**Physician Foundation**

**Approval:**

Stephen Valerio  
President and Chief Executive Officer  
Loyola University Physician Foundation

**I. PURPOSE**

The Loyola University of Chicago's Stritch School of Medicine (SSOM), Loyola University of Chicago's Neihoff School of Nursing (SON), Loyola University Health System (LUHS), Loyola University Medical Center (LUMC) and Loyola University Physician Foundation (LUPF), (collectively "Loyola") desire to provide direction for Colleagues who engage in consulting services or who are members of Vendors' speaker bureaus.

**II. DEFINITIONS/APPLICATIONS**

**A. Definitions**

1. Annual Disclosure Statement – The Statement certain Colleagues are expected to fill out annually. See the Conflicts of Interests and Disclosure of Certain Interests Policy P-17 for more details on the Annual Disclosure Statement and its reporting process.
2. Colleague or Colleagues – A Colleague(s), for purposes of this policy, is defined as any of the following:
  - a. Employees of LUHS, LUMC and LUPF

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- b. Employees of LUC working on the Maywood campus, including SSOM and SON
  - c. Graduate Medical Education residents and fellows
3. Department Chairperson – Department Chairperson, for purposes of this policy means the Chair of a clinical or basic sciences department of the SSOM, Chair of the SON, Medical Director of the LUMC Emergency Department or the Primary Care Division, as applicable.
4. Supervisor – A Supervisor, for purposes of this policy is defined as follows:
- a. For faculty, the Department Chairperson
  - b. For Department Chairpersons, the Dean of the SSOM or SON as applicable
  - c. For non-faculty employees, his/her Vice President or Associate Dean, as applicable
  - d. For Associate Deans, the Dean of LUC-SSOM
  - e. For Vice Presidents or higher, the Senior Vice President or President as applicable
  - f. For residents and fellows, the Department Chairperson
5. Vendor – A Vendor, for purposes of this policy, is defined as an entity doing or seeking to do business Loyola.

### B. Applications

This policy applies to Colleagues as defined in this policy.

### III. PROCEDURE/INFORMATION

Colleagues who engage in services for or on behalf of a Vendor should follow the guidelines below in order to ensure that their services provided to Vendors are within Loyola policy.

- A. **Covered Services** - The following list of services are examples of services covered under this policy when performed by a Colleague for or on behalf of a Vendor:
- 1. Presentation of scientific, clinical and related professional information about Vendor's product to the public by speaking at conferences or seminars at the request of the Vendor.
  - 2. Speaking at Vendor sales meetings.
  - 3. Attendance and participation in meetings about the Vendor's products.
  - 4. Participation in telephone conferences regarding the Vendor's products with the Vendor or its agents to discuss development, design or improvements of Vendor's products.

### B. General Guidelines

- 1. A Colleague's Supervisor should preapprove consulting services to be performed by Colleagues for Vendors. The attached form should be used when obtaining Supervisor's approval.
- 2. Colleagues should not accept any payment as "compensation" for their time or any out-of-pocket expenses except for honoraria or consultation fees for actual services rendered.
- 3. These activities should be accomplished on the Colleague's and not Loyola's time.
- 4. These activities should not violate the terms of the Colleague's existing employment agreement, if appropriate, with any of the Loyola entities.
- 5. Any taxes due relative to payment for the consulting services must be borne by the Colleague and not Loyola.
- 6. The frequency of the services provided to any one Vendor should be limited in nature.
- 7. Consulting services or participation on speaker bureaus should not influence a Colleague's purchasing or prescribing practices.
- 8. The amount of compensation cannot exceed fair market value for the services performed.
- 9. All payments to Colleagues providing services to Vendors should be made in accordance with a written agreement.

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10. Colleagues should report these activities on their Annual Disclosure Statement.

**C. Speaker Bureaus** - Colleagues who participate should follow the following guidelines on Vendors' speaker bureaus.

1. The purpose of the speaking engagement should be to promote scientific and educational activities and not to promote the Vendor's products, directly or indirectly.
2. The content should be fair and balanced.
3. To the extent possible, meaningful disclosure should be made of any limitations on data, e.g., ongoing research interim analyses, preliminary data, or unsupported opinion.
4. Generally, there should be no discussion of off-label uses of drugs promoted by a Colleague at any event funded by a Vendor.
5. Colleagues should give no product endorsement to audience participants.
6. Vendors should not plan the Colleague's presentation. There should be no "scripting" emphasis or direction of content by the Vendor.
7. Meaningful disclosure should be made by the Colleague to the audience at the time of the presentation: a) Vendor compensation to Colleague in exchange for speaking at the event; and b) any significant relationship, if any, between Colleague and the Vendor.
8. The services should occur in a venue and manner conducive to learning; therefore, locations for these events should be at clinical, educational, conference or other settings.
9. No Loyola trademarks or logos should be used or endorsement implied. An appropriate disclaimer should be added to materials. See Tax-Exempt Policy A-31 for more information.

**IV. RESPONSIBLE PARTY**

The LUC Vice President for the Health Sciences, the LUHS/LUMC President & Chief Executive Officer and the LUPF President and Chief Executive Officer, as applicable and in collaboration with the appropriate Chief Compliance Officer, should use all necessary authority to implement this policy, enforce it, and assess its effectiveness from time to time.

**Supervisor Approval Form**

**Instructions:**

1. This form should be used to obtain your Supervisor's pre-approval as required by any of the following policies:
  - a. Vendor Access – PS-6.
  - b. Vendor Relations – PS-10.
  - c. Vendor Receipt of Vendor Funds for Educational Events – PS-11.
  - d. Vendor Funding for Off-Site Promotional Training and Seminars – PS-12.
  - e. Permissible Arrangements between Colleagues & Vendors Policy – PS-13.
  - f. Itinerant Vendors – PS-18.
  
2. Supervisor, for purposes of this form means:
  - a. For faculty, the Department Chairperson
  - b. For Department Chairpersons, the Dean of SSOM or SON as applicable,
  - c. For non-faculty employees, his/her Vice President or Associate Dean, as applicable
  - d. For Associate Deans, the Dean of LUC-SSOM
  - e. For Vice Presidents or higher, the Senior Vice President or President as applicable
  - f. For residents and fellows, the Department Chairperson
  
3. The Supervisor should maintain a copy of this form in the Colleague's personnel file.
  
4. The staff member completing this form should retain a copy of the form in his/her departmental files.

**Reason Supervisor Approval is requested:**

- Vendor funded educational event
- Vendor funded attendance at professional association conference
- Vendor promotional training
- Vendor sponsored seminar
- Vendor sponsored site visit
- Consulting services performed by Loyola staff for vendor
- Speaking engagements performed by Loyola staff for vendor
- Vendor booth on-site at Loyola

**General Information:**

Name of Person Completing this Form: \_\_\_\_\_  
 Phone Number: \_\_\_\_\_ Department: \_\_\_\_\_

**Vendor Information:**

Vendor: \_\_\_\_\_

**Program/Event/Service Information:**

Title/Subject matter: \_\_\_\_\_

Description of Program/Gift/Compensation to be received: \_\_\_\_\_

Purpose/Benefit: \_\_\_\_\_

Dollar Amount: \_\_\_\_\_

**Signature of Requestor:**

**Signature of Supervisor if approved:**

\_\_\_\_\_  
 Signature  
 Dated: \_\_\_\_\_

\_\_\_\_\_  
 Signature  
 Dated: \_\_\_\_\_