

Policy for Managing Private Biomedical Research Industry* (PBRI) Interactions at the UNM HSC: Equipment Vendors and Suppliers**

Goals to be achieved for a Policy to guide the interactions of the HSC with PBRI:

- To establish guidelines for vendor access, vendor fairs and other supplier interactions at the UNM HSC
- To establish compulsory registration for sales, marketing, or technical representatives while on the UNM HSC campus.
- To coordinate new policy guidelines with existing University Hospital vendor guidelines. This policy will address scientific vendors serving the research enterprise of the HSC.

*For the purpose of this Policy, Private Biomedical Research Industry (PBRI) is defined as establishments engaged in one or more of the following: (1) manufacturing or providing biological and chemical products for research, including reagents, instruments, gloves and other devices, animals, glassware and other laboratory equipment; (2) purifying molecules of any type for research use; and (3) manufacturing products intended for use or support of laboratory research.

1. Provision of Compensation or Gifts from Vendors to HSC Faculty, Staff, and Trainees

- a. UNMHSC faculty, staff and trainees may not accept any form of personal gift from PBRI or its representatives anywhere on the UNM HSC campus. Vendors may leave samples of disposable supplies or equipment for the laboratory investigator to try. The quantity should be sufficient only for comparative or evaluation purposes and not serve as a financial inducement to purchase the product. Free equipment or supplies cannot be offered as bonuses for use of the product.
- b. Meals funded by PBRI can not be provided on the UNM HSC campus.
- c. HSC faculty, staff and trainees may accept only fair market compensation for specific, legitimate services provided by him or her to a PBRI. Payment must be commensurate with time and effort.
- d. HSC faculty, staff and trainees may not accept compensation or gifts for listening to a sales pitch (e.g., detailing) by an industry representative.
- e. HSC faculty, staff and trainees who are simply attending a continuing education or other instructional activity and are not speaking or otherwise actively participating or presenting at the meeting, should not accept direct compensation from PBRI either for attending or defraying costs related to attending the meeting.

f. HSC researchers must conscientiously and actively divorce purchasing decisions from any potential or actual benefits accrued or expected from any PBRI (including but not limited to personal gifts, research funding, scholarships for continuing education attendance, consulting agreements, and the like).

g. HSC faculty or staff who are involved in *institutional* decisions concerning the purchase or approval of capital equipment or research supplies, or the negotiation of other contractual relationships with industry, must disclose any relevant financial interest (e.g., equity ownership, compensated positions on advisory boards, a paid consultancy or other forms of compensated relationship) in an industry that might benefit from the institutional decision. Where actual or potential conflict of interest exists, the individual should recuse him/herself from the process. This provision is not intended to preclude the indirect ownership, through mutual funds or other investment vehicles, of equities in publicly traded pharmaceutical companies by UNM faculty nor does it require declaring a potential or real COI for holding mutual funds as described herein.

2. Disclosure of Relationships with Vendors

a. HSC faculty are required to provide specific written information on financial interests related to their research at UNM in compliance with Regent approved University regulations.

b. HSC faculty, staff and trainees must disclose their potential conflicts of interest related to institutional deliberations and recuse themselves when participating in deliberations in which he or she has an actual or potential conflict of interest.

c. HSC faculty with supervisory responsibilities for trainees or staff must ensure that conflicts or potential conflicts of interest do not affect the supervision or educational process.

3. Vendor Fairs

At predetermined times, the HSC may allow vendors fairs where industry representatives can display and demonstrate their products to the research faculty. These events will be announced in advance and invitations issued after vendors apply for space at the fair. No personal gifts of any kind can be accepted by attendees of the fair, including food. Limited samples to test, product brochures and specification sheets are allowed.

4. Exceptions

Faculty or departments seeking exceptions to the above policy may petition the Executive Vice President for Health Sciences, who will convene a three-person ad hoc committee to review the request and advise the Executive Vice President, whose decision will be final. Requests should clearly identify how the benefits resulting from the exception outweigh the risks, perceived or real.