I. POLICY

All graduate trainees shall maintain appropriate ethical relationships with all industry interactions. Such interactions must abide by all hospital regulations. All interactions with manufacturer’s representatives will be approved by the Director of Medical Education or the Program Director of the Department responsible for the graduate trainee.

No part of this policy will negate Lehigh Valley Hospital Administrative Policy 1100.03 - Conflict of Interest.

II. SCOPE

All graduate trainees

III. DEFINITIONS

Graduate Trainee - Any postgraduate M.D. or D.O., D.D.S., or D.M.D. physician in training, whether or not in an ACGME approved training program.

CMO - Chief Medical Officer

Immediate Family Members - Spouse, domestic partner, cohabitant, child, stepchild, grandchild, parent, stepparent, mother-in-law, father-in-law, son-in-law, daughter-in-law, grandparent, great grandparent, brother, sister, half-brother, half-sister, stepsibling, brother-in-law, sister-in-law, aunt, uncle, niece, nephew, or first cousin (that is, a child of an aunt or uncle).

IV. PROCEDURE

<table>
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<tr>
<th>ACTION</th>
<th>RESPONSIBILITY</th>
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<tr>
<td>All graduate trainees will conform to the American Medical Association Guidelines for Gifts from Industry to Physicians (Opinion 8.061).</td>
<td>Graduate Trainee</td>
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<tr>
<td>Items such as mugs, pens, and similar items may be accepted by a Graduate Trainee from a vendor as long as they do not exceed nominal value and no more than one hundred dollars ($100) in the aggregate annually per recipient (Reference AMA Guidelines; AdvaMed Guidance)</td>
<td>Graduate Trainee</td>
</tr>
</tbody>
</table>
Meals and refreshments may be provided only to attendees and must be modest in nature and subordinate in time and focus to the training and/or education.

Graduate Trainee

All educational gifts and donations to graduate trainees from manufacturers shall be made through the Department responsible for graduate trainee training. Such gifts and donations shall be distributed equitably among the graduate trainees. This shall include books, journals and medical instruments, as well as scholarships or funds to defray educational expenses.

Graduate Trainee; Program Directors

Graduate trainees or their immediate family members shall not accept gifts, monies, tickets, medication or other inducements from manufacturers due to the training status of the graduate trainee. (Reference AMA Guidelines)

Graduate Trainee

Graduate trainees found to violate this policy will be counseled by their Program Director. Graduate trainees violating the policy a second time will be placed on probation and thereafter required to be documented.

Graduate Trainee

Graduate trainees violating the policy a third time will be subject to dismissal.

Graduate Trainee

V. ATTACHMENTS

American Medical Association Guidelines for Gifts from Industry to Physicians (Opinion 8.061)

http://www.pharmaccomplianceforum.org/docs/resources/AMA-Physicians.pdf

AdvaMed Code of Ethics on Interactions with Health Care Professionals.


Approved by the Graduate Medical Education Committee

<table>
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<tr>
<th>Approved by:</th>
<th>Brian Costello (Physician), Thomas Whalen (Evp &amp; Chief Med Officer)</th>
<th>Approval Date:</th>
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