MEMORANDUM

DATE: June 28, 2012

TO: PVM Students

FROM: Peter W. Hellyer

RE: Corporate Donations

The role of corporate gifts/freebies to students in medical education has been debated for a number of years and the issue has received increased attention in veterinary medical education recently. The Association of American Veterinary Medical Colleges (AAVMC) has developed guidelines for colleges and schools of veterinary medicine to consider as each program develops its own policies (guidelines attached). Anecdotally it appears that some policies are very strict, whereas others are much more open to corporate giving to students. The policy in the PVM Program is evolving to manage donations appropriately. There is no doubt that the PVM Program and our students have benefited tremendously over the years as a result of support from numerous external sources, including corporate sponsorship. Some of this support comes in the form of cash donations to the College to support specific programs, and some comes as gifts in kind directly to the PVM students (e.g., free lunches, books, backpacks, pet food). Although we are able to track cash gifts which come to the College, we still do not have a clear picture of the extent to which gifts in kind are provided to PVM students and the impact of those gifts in spite of instituting reporting requirements at the beginning of 2011.

I am pleased that SCAVMA has taken a leadership role in the issue with the creation of a PVM Student Corporate Liaison. I am optimistic that this position will serve to keep the administration informed of student opinions on this issue, serve as a source of information for fellow students, and be a contact for outside companies wishing to establish/renew corporate student representative positions.
Covered Donations:  
This policy specifically covers corporate donations to PVM student organizations and does not cover donations directly to the College or research contracts or grants awarded to faculty members.

This policy does not apply to donations/gifts from not for profit organizations, such as the Colorado Veterinary Medical Association.

PVM Curriculum Requirement:  
The potential influence of corporate donations on PVM education will be discussed in small group settings during PVM Orientation followed by more in-depth discussions in the Foundations in Veterinary Medicine (VM610) course fall semester. First year PVM students are not permitted to receive corporate gifts/freebies as part of the PVM Program until the completion of orientation. This will allow us to introduce the concept of ethical interactions between the students/college and outside entities. Students may begin receiving donated corporate items with the start of regularly scheduled classes, fall semester of the first year. First year students may participate in corporate sponsored meals and participate in company sponsored pet feeding programs.

Reporting Requirements:  
All PVM students serving as corporate sponsors or student representatives are required to provide an annual accounting of what has been donated to the PVM Program and an estimated value of that donation. The following information should be sent to the SCAVMA Corporate Liaison and the AD-PVM either by the student representative or directly from the company:

- Company name
- Educational goals of the donation
- Company contact name and contact information
- PVM Student rep name
- Preferred method of communication with the company (SCAVMA Corporate Liaison, Company PVM Student Rep, AD-PVM, other)
- Preferred method of requests for further donations (some companies prefer annual requests whereas others may accept requests throughout the year)
- Please specify if there is a maximum amount for a single donation or annual donation
- Funds and/or Item(s) donated
- Date(s) of donation
- Approximate number of students receiving the donated item(s)
- Approximate number of faculty, interns, residents, and staff receiving the donated item(s)
- Which PVM Classes received the item(s) – this could include all classes if the item(s) were donated through a club activity
- Approximate market value of donation
The annual giving reports are due by June 30th. Submitting complete reports will be a requirement for all outside organizations to be able to maintain a student representative in the PVM Program.

Annual reports will be posted on the SCAVMA RamCT site for internal use only. Students are encouraged to review the material and reminded that it is not for outside distribution.

SCAVMA Reports:
SCAVMA is encouraged to report annually how donated funds (including funds generated from the sale of pet food) were used by SCAVMA and the PVM clubs. In other words, what were the funds used for? Ideally this report would be posted on the SCAVMA RamCT site alongside the annual corporate report.

PVM Student Reps:
The SCAVMA Corporate Liaison is encouraged to take an active role in organizing the PVM student corporate representatives. This may include serving as a clearinghouse for requests from companies seeking to create a new position, maintaining a list of previous and current student representatives, creating guidelines which are consistent with PVM Program policies and the PVM Student Code of Honor, and serving as a resource for students and outside companies.

Guidelines for Corporate Sponsored Speakers:
There are multiple opportunities for PVM students to attend optional lunch and dinner lectures and discussions to learn more about a particular topic. Most of these events are organized by PVM clubs and sponsored by corporate or other outside groups. There is no doubt that these opportunities add to the experience of our students in the program and provide valuable information which supplements our formal curriculum. Individuals or groups organizing these events are encouraged to follow these guidelines to ensure the presentations meet minimum standards for Continuing Education presentations.

- Presentations should be a literature/abstract update on research that has been published (or is pending publication) on the selected topic
- If a specific product is discussed, the focus of the presentation should be on the science related to the product
- Presentations should not be geared towards selling specific products
- Ideally, the presentation should be given by a veterinarian or research scientist
- The individual or group organizing the event should distribute, prior to the day of the event, a one-page description that identifies (a) three learning objectives for the presentation, (b) the name of the individual who will deliver the presentation, (c) affiliation of the presenter.
Introduction:
This document is intended to reflect the general principles and considerations that the Association of American Veterinary Medical Colleges (AAVMC) considers important in the development of policies related to interactions with industry, donors, or other external entities. It is not intended to be exhaustive of all possibilities or circumstances that may confront a school or college of veterinary medicine.

The AAVMC strongly encourages individual schools and colleges of veterinary medicine to develop and implement detailed policies, tailored to the individual institution, that ensure freedom from bias or inappropriate influences that might otherwise occur as a consequence of support from external entities.

Schools and colleges of veterinary medicine hold a public trust, with the expectation that educational, clinical, research and outreach programs will be based on the best, current and unbiased scientific knowledge. That information must be free of biases or inappropriate influences that may result from interactions with external entities, especially with companies that provide goods and services of value within veterinary medicine. Educational institutions and their faculty, staff and students can benefit in many ways from different types of support that can be provided by industry. The institution and the school/college share a responsibility of managing that support in a manner that ensures the integrity and independence of all of its academic programs.

Private philanthropy has also played a significant role in enhancing the educational programs of schools and colleges of veterinary medicine, and the importance of private philanthropy has grown remarkably in recent years. The foundation at the institution of each school/college will have its own established criteria for accepting or declining a gift and for determining whether a proposed gift is truly a gift, i.e., without expectations of a deliverable product, as would be expected from a research or educational contract. In addition to foundation criteria, however, the school or college should ensure that a gift does not influence the integrity of its decisions on such academic issues as curriculum, student admissions or academic advancement decisions, among others.

Definitions of terms used within this document:
- **Industry or Industry Representatives**: Manufacturers, servicers, and other vendors of pharmaceutical, medical and veterinary medical devices and supplies, commercial products, and medical and veterinary medical testing companies and their employees, representatives, agents, and vendors.
- **Consortium**: Represents a collection of companies or commercial concerns who may contribute resources to a common pool to a school/college. Such a consortium may be
formally established, or may simply represent a collection of companies whose gifts are pooled and administered by the institution.

- **External entities**: Include, but are not limited to, commercial companies, not-for-profit and/or charitable organizations, government (e.g., legislators, and philanthropic groups), and individual donors.
- **Faculty and Staff**: All individuals holding appointments, whether paid, unpaid or emeritus, in a school/college.
- **Institution**: The university in which a school/college of veterinary medicine is administratively embedded.
- **Foundation**: The organization or office of the institution that is responsible for accepting gifts.
- **School/college**: An individual school or college of veterinary medicine
- **Student**: All individuals enrolled in courses offered by the school/college or completing a course of study, e.g., as a trainee/fellow/graduate student within a school/college.

**Background information for gifts and services:**

- **Gifts and services to faculty, staff and students**: Gifts and services to faculty, staff, individual students and student organizations may take many forms, such as pens, food and beverages, back-packs, items of clothing, books, and sporting/concert tickets. Such gifts have been shown to significantly influence the attitudes and preferences of the receiver, regardless of the value or nature of the gift.

- **Gifts and services to the school/college/teaching hospital from industry donors**: Examples of these gifts include pharmaceutical or biological products, animal food/feed, equipment or monetary donations. Such gifts may influence the attitudes and preferences of faculty, staff and students, particularly if they are aware that these products have been provided as a gift by a specific entity rather than through a purchase by the institution. That influence is increased if faculty, staff and students are not exposed to competing products.

- **Gifts from individual companies versus gifts from an industry consortium**: Gifts from an individual company, especially when dedicated to a specific purpose, can present a particular challenge for the institution struggling to provide appropriate recognition while seeking to avoid the creation of a preferential bias toward that company. That process may be eased, but not reduced in importance, when numerous companies provide resources toward a similar purpose through a consortium, with no single company serving as a dominant contributor. In such circumstances, it is incumbent on the school/college to maintain open access to other companies seeking to join the consortium, providing that all companies adhere to the same common consortium rules adopted by the school/college. Ultimately, the school/college must solely control the use and application of such resources.

- **Gifts to the school/college/teaching hospital from private donors**: Examples of gifts from private donors can include monetary donations, facilities, land, and bequests. The normal and routine recognition of a private donor, e.g., a named room, building, scholarship, etc, may pose ethical issues such as maintaining the integrity of admissions and academic
advancement decisions of a student who is a relative of the donor. The policies of the institution and its foundation will determine the decision to accept or reject a gift, as well as the level and nature of the recognition of a donor for that gift.

**Important Principles**

- **Transparency and disclosure:** Faculty and staff who have financial interests in a company, as defined by the institution’s conflict of interest policy, who are supported by grants/contracts from a company, serve as consultants to a company, or who may have similar relationships must clearly and openly disclose such relationships to students.

- **Maintaining intellectual independence of individuals and the institution:** The intellectual independence of faculty and staff must be maintained and protected. The independence is abrogated if/when faculty engage in such activities as accepting compensation for speaking engagements that limit their discretion regarding content, or agree to have their name included on a publication to which they did not meaningfully contribute.

- **Value of gifts and their impact:** As noted previously, gifts, regardless of their nature or value, have been shown to influence attitudes and preferences of the receiver.

- **Gifts such as pharmaceutical/biological products from a company or consortium of companies:** If such gifts are permitted by the school/college/teaching hospital, should be managed centrally so they can be utilized without attribution to a specific company.

- **Continuing veterinary medical education (CVME):** All CVME programs developed and presented by a school/college must conform to the standards and processes of that school/college. While commercial companies, singly or as a consortium, may provide support for CVME programs, the school/college must maintain sole responsibility and control of the CVME program, e.g., selection of speakers, program content, etc.

- **Gifts for scholarships/fellowships:** Scholarships or similar funds, e.g., for graduate student or intern/resident support from a company should be given centrally to the school/college, and in a manner consistent with the gift acceptance policies of the institution and its foundation. Consistent with the widely accepted definition of a gift, a gift should not require a quid pro quo other than the normal level and nature of recognition and acknowledgement provided by the foundation of the receiving institution. The evaluation and selection of recipients of such gift funds must be determined by the school/college, without involvement of an individual company or consortium.

- **Gifts versus contracts:** Commercial concerns may wish to establish educational contracts with a school/college for specific educational activities, e.g., internship or residency training, typically for an individual designated by the company. Support provided for such purposes is to be distinguished from a gift, and in most institutions will follow a process for institutional and school/college approval that is similar, if not identical, to that of a research contract. Beyond such approval processes, the school/college holds the responsibility for establishing and implementing processes that ensure that educational contracts are
consistent with the academic independence and integrity of the school/college and its training programs.

• Financial remuneration from industry: Remuneration by a company for services or skills provided, whether as a consultant, representative, etc, clearly introduces the potential of bias. Faculty and staff with such relationships are subject to their institution’s conflict of interest policy. Students are not subject to those policies, but may be approached by industry to serve as paid “student representatives” of a particular company. The compensation or considerations they may receive for such activities may influence their attitudes and preferences, similar to that of a gift. Each school and college should consider and address the practice of “student representatives” as they develop their policies for interaction with external entities.

• Integrity of purchasing decisions: Personnel employed by a school/college who have a financial interest, as defined by the institution’s conflict of interest policy, in a company or commercial entity should not play a role in any school/college purchasing decisions that may involve products or services of that company.

• Use of generic versus brand names in instruction: The use of brand names in didactic instruction provides a clear risk of bias or undue influence. Consequently, the use of generic terms should be strongly encouraged, with the use of brand names reserved for circumstances when their use is important for clarity, student awareness, or to discuss differences between products. In such instances, the reason for brand identification should be made clear in the course syllabus and/or during the presentation.

The AAVMC is committed to working with its member schools/colleges to ensure that our professional and academic integrity are affirmed and maintained. These guidelines are reflective of that commitment, and are intended to provide general guidance to schools and colleges of veterinary medicine. Each school/college retains the responsibility and authority to develop their own policies, individualized for that institution, to govern their interactions with external entities. Support from external entities, of all types, for schools and colleges of veterinary medicine has taken many forms over the years, and has significantly enhanced the success of the instructional, research, and outreach missions of our AAVMC constituent institutions. These guidelines, and the individual policies promulgated by each institution, are intended to manage such relationships and support in a manner that will maintain the public trust that is at the core of academic veterinary medicine and our profession.

22 June 2011