

Supplemental Digital Table 1

Codebook for Assessing the Strength of Medical Schools' Clinical Conflict of Interest Policies*

Response	Code	Example
Gifts		
Stringent – No gifts or payments permitted, regardless of dollar amount (best practice)	3	
Modest restrictions – Imposes some limits on gifts	2	Value of gifts accepted may not exceed a specific dollar amount per year; educational gifts are permitted
Permissive/weak – No restrictions on gifts; disclosure of gifts may be suggested or required	1	All gifts are permitted; cumulative value of gifts during a specified time period may be reported
No policy	0	
Meals		
Stringent – No meals permitted on campus; industry grants for food are funneled to a central repository (best practice)	3	
Modest restrictions – Puts some limits on meals	2	Acceptance of certain foods permitted; food may be directly accepted by staff for CME and educational events
Permissive – No restrictions on meals	1	Staff may accept any food provided by industry
No policy	0	
Vendor access		
Stringent – Vendors require registration, appointments, and badges; they are not permitted in public/patient-care areas; they must undergo training/orientation (best practice)	3	
Modest restrictions – Puts some limits on vendor access	2	Vendors are permitted with some conditions: may only require appointments OR badges OR registration
Permissive – No restrictions on vendor access; interaction left to the discretion of physicians or departments	1	Vendors are permitted without conditions; may require staff escort
No policy	0	
Samples		

Stringent – Samples and donated products are not permitted; samples may be donated to hospital pharmacy and are not for personal use by staff (best practice)	3	Only pharmacy can accept and manage samples; vouchers are permitted in place of doctor-distributed samples
Modest restrictions – Some limits on samples to physicians and staff	2	Samples distribution is permitted in ambulatory or outpatient care areas
Permissive – No restrictions on samples	1	Management of samples is left to the discretion of depts. and physicians
No policy	0	
P&T committees [†]	3	
Stringent – No conflicted individuals allowed on purchasing committees OR required disclosure and recusal (best practice)	2	P&T Committee members must not have financial relationships with industry; those who do must be recused from participating in decision-making
Modest Restrictions – Conditional Disclosure and/or recusal	1	Financial disclosures may or may not be mandatory; recusal is conditional on financial interests above a specific dollar amount
Permissive/weak – No restrictions on P&T committee participation	0	Vendors cannot be involved in purchasing decisions; no recusal procedure exists for members with financial interests
No policy		
Continuing medical education		
Stringent – No industry money accepted OR unrestricted grants are managed by a central repository; all content is peer-reviewed for scientific accuracy/bias (best practice)	3	Staff and depts. are prohibited from directly accepting industry grants for CME; grants must be unrestricted and provided to a university account; all content is reviewed for bias
Permissive – ACCME standards; possible allowance for individuals and/or dept. to directly accept grants	1	Industry-sponsored CME must meet ACCME standards; grants may be restricted or given directly to departments
No policy	0	
Consulting		
Stringent – Public disclosure of payments and dept. approval required (best practice)	3	Consulting restricted to contracted activities with scientific and/or educational merit
Some restrictions – Consulting activities require approval; disclosure is conditional; some limits imposed	2	Public disclosure of consulting not required; contract requirements may not be explicit

Permissive/weak – No disclosure required; no restrictions on activities; may impose time limits on consulting activities	1	Consulting activities are left to individual discretion; consulting activities limited to set amount of days/hours
No policy	0	
Honoraria		
Stringent – No acceptance of honoraria; compensation must be at fair market value and publicly disclosed	3	Acceptance of honoraria must have prior dept. approval and must be for educational activities
Moderate – Limits on accepting/disclosing honoraria	2	Public disclosure not required; purpose of honorarium may not be explicit
Permissive – No limits on acceptance	1	Acceptance left to individual discretion
No policy	0	
Travel/scholarships		
Stringent – No industry money accepted OR unrestricted grants are managed by a central university repository (best practice)	3	Recipients of grants must be chosen by University; programs must be deemed to have educational merit
Modest restrictions – Puts some limits on accepting industry funding	2	Travel funding may be accepted by individuals for consulting/CME events
Permissive – No restrictions	1	Staff and students may accept industry support for travel and education
No policy	0	
Ghostwriting		
Stringent – Ghostwriting is not permitted (best practice)	3	No presentations, oral or written, may be ghostwritten
Permissive	1	Few or no restrictions; management left to individual discretion
No policy	0	
Speakers' bureaus[‡]		
Stringent – Participation on speakers' bureaus is not permitted (best practice)	3	
Some restrictions – Participation is permitted, with some restrictions	2	Restrictions may include: prior dept. approval, disclosure, and content review for scientific accuracy and bias; speaker responsible for all content
Permissive – No limits on participation in	1	Dept. approval and disclosure may or may not be required; no

speakers' bureaus	stipulations for content review
No policy	0

*From the Institute of Medicine as a Profession (IMAP) survey of medical schools' policies, October 2007-December 2008.

Developed based on guidelines set forth by IMAP, the Association of American Medical Colleges, and the Institute of Medicine.

† P&T (Pharmacy and Therapeutics) Committees are formal decision-making bodies, usually composed of physicians and pharmacists, that oversee the purchasing of pharmaceutical products.

‡ Speakers' bureaus are arrangements whereby companies train and pay physicians to speak on specific topics, typically using slides or other materials prepared by the company.