**Self-Assessment Tool**: Use following questions to help identify if you have any **industry-physician financial relationships**. If you answer “Yes” to any of the questions in Column 1, you have an “industry-physician financial relationship”. Refer to Column 2 to assess the appropriateness of the relationship and for additional resources.

<table>
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<tr>
<th>#</th>
<th>Column-1: Self Assessment Questions</th>
<th>Column-2: Resources &amp; General Guidance to assess if the relationship is appropriate</th>
</tr>
</thead>
</table>
| 1 | **Financial Interests:**

Have you or a member of your immediate family received compensation (in cash or in kind) from a health care-related company?
- **Examples**: Consulting agreements, honoraria, royalties, paid travel and expenses, payment to attend educational sessions.
| What are "financial interests"? A financial interest is anything of economic value, including a fiduciary relationship with an outside entity. While not an exhaustive list, examples of financial interests include positions such as director, officer, founder, partner, or manager of an entity (whether paid or unpaid); scientific advisory board membership; salaries; consulting income; stock or stock options (vested or not vested); honoraria; loans; and travel payments.

Financial relationships with companies doing business with the University of California require that you disclose and recuse yourself from direct and indirect purchase decisions and contracting. Financial relationships related to research grants must also be disclosed. For outside professional activities, time must be disclosed annually; compensation should be an equivalent value for legitimate activities and actual work performed.

**Resources**:
- UCSD Conflict of Interest Office, [http://coi.ucsd.edu](http://coi.ucsd.edu)
- UCSD APM-025
- UCSD Conflict of Interest policies (PPM 200-13) [http://adminrecords.ucsd.edu/ppm/docs/200-13.html](http://adminrecords.ucsd.edu/ppm/docs/200-13.html)

<table>
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<tr>
<th>2</th>
<th>Do you or a member of your immediate family invest directly or have an ownership / equity interest in a health care-related company?</th>
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<tr>
<td>3</td>
<td>Do you or an immediate family member serve as a member on the Board of Directors or Advisory Board (compensated or uncompensated) for a health care-related company?</td>
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<tr>
<td>4</td>
<td>Do you or a member of your immediate family own intellectual property rights in a product of a health-care related company?</td>
</tr>
</tbody>
</table>
| 5 | **Gifts:**

Have you or a member of your immediate family received a gift from a health care-related company?

**Examples of Gifts**:
- Payment directly to a health care individual or provision of free or discounted items to an individual; medical samples for personal use; food; travel (when the health care individual is not providing a service of similar or greater value to the health care vendor); pens; notepads; free textbooks; free meals; waiver of registration fees.

Gifts conveyed directly to an individual (or group of individuals) or where the health care vendor selects the ultimate recipient of the gift are prohibited. Honoraria for a specific service rendered (e.g., delivering a speech) are not considered Gifts.

**Resources**:
- UC “Policy on Health Care Vendor Relations” [http://www.ucop.edu/ucophome/coordrev/policy](http://www.ucop.edu/ucophome/coordrev/policy)
- Alternative: A donation to “Regents of UC” may be accepted via the UCSD Office of Gift Administration (External Relations). Refer to the Gift Office web-site for policies/procedures for receipt / gift acceptance; public reporting.
- [http://giving.ucsd.edu/howtogive/](http://giving.ucsd.edu/howtogive/)

| 6 | **Speakers Bureaus & Ghostwriting:**

Do you participate on a Speakers’ Bureau for a health care-related company? |
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<tbody>
<tr>
<td>7</td>
<td>Has a health-care related company been involved in ghostwriting any of your publications?</td>
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</tbody>
</table>

Financial support provided by industry should be fully disclosed by the meeting sponsor. General guidance:

- The lecturer is solely responsible for the content of the lecture.
- The lecturer is expected to provide a fair, balanced, and where possible evidence-based assessment of therapeutic options and to promote balanced discussion of the topic.
- The lecturer prepares his or her slides and other educational materials and does not delegate this to industry sponsors.
- The meeting organizer is not required by an industry sponsor to accept advice or services concerning speakers, content, or meeting organization as a condition of the sponsor’s contribution of funds or services.

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1 Immediate family means the spouse, including a registered domestic partner, and dependent children. (Gov. Code § 82029.)

**Disclaimer**: This assessment tool is not intended to replace legal advice.
### Conflict of Interest

**Self-Assessment Tool**

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<td></td>
<td><strong>Research Grants &amp; Fellowship Support:</strong> Have you received a research grant or support for research from a health care-related company?</td>
<td>e. Speakers Bureau Discussions about Off-Label Use (using drugs / devices for purposes other than the FDA approved label use) are <strong>strongly discouraged</strong>. It is illegal for drug / device manufacturers and their representatives to advertise off-label use – or to induce physicians to prescribe off-label uses. Physician speakers may provide information to other medical professionals regarding off-label use but this information must be based upon personal experience and medical judgment. Be aware that it is illegal for industry (and for physicians representing industry) to engage in off-label “marketing” of drugs / devices for purposes that have not been approved by the FDA.</td>
</tr>
<tr>
<td>7</td>
<td>Do you receive financial support for fellowships from a health care-related company?</td>
<td>f. Speakers Bureaus where the health care vendor controls or influences the speaker’s presentation or includes promotion of off-label use is <strong>prohibited</strong>.</td>
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<tr>
<td>8</td>
<td><strong>Continuing Education Support:</strong> Have you received support for continuing education programs from a health care-related company?</td>
<td>Research grants from industry require submission of a 700-U form and IRB approval, as applicable. OCGA manages monies for grants and fellowship support. (All 700-U forms are reviewed by the UCSD Conflict of Interest Office for potential conflict of interest).</td>
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<td>10</td>
<td></td>
<td>- Conflict of Interest Office, <a href="http://coi.ucsd.edu">http://coi.ucsd.edu</a></td>
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<td>- OCGA: <a href="http://ocga.ucsd.edu/">http://ocga.ucsd.edu/</a></td>
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<td>- In scholarly publications, faculty, staff, and trainees must disclose their related financial interests in accordance with the International Committee of Medical Journal Editors, <a href="http://www.icmje.org">www.icmje.org</a></td>
</tr>
</tbody>
</table>

### Managing Industry-Physician Financial Relationships

Almost all disclosed financial interests & resulting COI can be reduced, eliminated or managed.

1. **Disclose:** Outside professional activity must be disclosed by the annual submission of an APM-025 form. Category I activities require prior approval by your Department Chair and the Dean’s Office. [http://med.ucsd.edu/documents/APM025-DisclForm-CatIandII-HSCP-Rev06202008_000.doc](http://med.ucsd.edu/documents/APM025-DisclForm-CatIandII-HSCP-Rev06202008_000.doc)
2. **Divest:** Financial investments and/or ownership positions can be divested.
3. **Recuse:** Avoid participating in and influencing any purchase decisions for a company’s products where a financial relationship exists – for 12 months.
4. **Seek:** Seek advice from your personal attorney or the UCSD Conflict of Interest Office staff (858-534-6465) or Tony Perez, Esq., Chief Health Sciences Counsel for UCSD (858-246-0222). Independent contractual relationships with industry should be evaluated for compliance with UC policies.
5. **Ask:** Would you be comfortable seeing your financial relationship revealed on the front page of the San Diego Union Tribune?

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