



FOUNDED BY BRIGHAM AND WOMEN'S HOSPITAL
AND MASSACHUSETTS GENERAL HOSPITAL

Interim Policy Statement on Interactions with Industry

Effective October 1, 2009

Revised to reflect Policy on Industry Support for Education Programs effective May 1, 2010

Based upon the Report of the Partners Commission on Interactions with Industry, the following new policies are in effect for Partners HealthCare as of October 1, 2009 (except for those which are specified below as becoming effective on January 1, 2010 or May 1, 2010). Certain terms that have initial capital letters are defined in the attached glossary.

Gifts

Partners Individuals may not accept any gifts (including meals and entertainment or funding for meals and entertainment), regardless of value, from pharmaceutical Companies, medical device Companies, or other vendors of Partners. Partners and its Affiliated Corporations also may not accept any gifts (including meals and entertainment or funding for meals and entertainment), regardless of value, from pharmaceutical or medical device Companies or other vendors, of any items for the personal use of staff members, whether provided on a Partners site or off-site.

Who does this apply to?

The new policy prohibiting individuals from directly accepting gifts applies to all full-time Covered Individuals, and to all other Partners Individuals while acting in their Partners capacity. Outside Directors and Trustees (those who are not Covered Individuals) are expected to use their best efforts to abide by this policy. The second part of this new policy – prohibiting certain types of gifts to Partners institutions – will be implemented by the appropriate hospital and other administrative personnel who normally deal with these sorts of transactions.

Institutional Purchasing Transactions

Certain significant purchasing transactions may not be entered into unless and until the decision-maker has determined from the Partners conflict of interest database whether any relevant Partners Individuals have a relationship with the Company involved that is relevant to the transaction. When this occurs, the basis for entering into the decision will be documented in accordance with current requirements of the Partners Conflicts of Interest Policy. Criteria for these determinations will be established by the COI Committee and will be implemented by the Partners Materials Management office.

Who does this apply to?

This new policy does not require any specific action by any Partners Individuals. It will be implemented by the Partners Materials Management office.

Institutional Royalties from Institutional Sales

License agreements under which Partners technology is licensed to a Company must state that the Company will not pay to Partners royalties derived from the sales of a particular drug or device to that institution, unless the COI Committee has reviewed and approved a mechanism under which all such royalties will be donated to a specific charity.

Who does this apply to?

This new policy does not require any specific action by any Partners Individuals. It will be implemented by the appropriate hospital licensing offices.

Industry Support for Educational Programs – President’s Fund

In addition to other mechanisms which will be approved by the Education Review Board, in accordance with the Commission Report, Industry sources may contribute to the support of Partners educational activities at Brigham and Women’s Hospital, Massachusetts General Hospital, and McLean Hospital through the “President’s Fund for Medical Education” which has been established at each hospital. Similar Funds will be established at other Partners Hospitals. These Funds will be used to support institutionally-determined priorities in medical education. Specific programs will not be identified with the contributions from specific Companies, and a Company’s contribution to the President’s Fund must not be targeted or directed by the Company to any specific educational program. Educational programs funded by the President’s Fund need to be reviewed and approved by the ERB.

Who does this apply to?

This new policy does not require any specific action by any Partners Individuals. It will be implemented by the ERB and the appropriate hospital administrative offices.

Institutional Officials and Fiduciary Positions

Effective January, 1, 2010, an Institutional Official who holds a Board of Directors or other fiduciary position with any biomedical Company, or any other Company that does, or is reasonably likely to do, significant business with any Partners entity, may only retain personal cash compensation, not to exceed \$5,000 per day, equivalent to the fair market value payment, based upon time spent on Board meetings; and may not retain any equity compensation from that Company for serving in that position. The standard compensation for such a position (including equity) in excess of the allowed level may be donated to a non-Partners charitable organization if the arrangement has received prior review and approval by the COI - Committee.

Effective January 1, 2010, Institutional Officials may not accept any new relationship (whether fiduciary or not) with any biomedical Company, or any other Company that does, or is reasonably likely to do, significant business with any Partners entity, without prior review and approval by the COI Committee. The COI Committee shall also develop a schedule for review of pre-existing relationships of Institutional Officials.

Who does this apply to?

This new policy applies to Institutional Officials.

Outside Fiduciary Positions of Other Partners Individuals

Effective January 1, 2010, full-time Covered Individuals who are not Institutional Officials may not accept new positions on a Board of Directors, or any other position with fiduciary responsibility, in a biomedical Company, without prior review and approval by the COI Committee.

Who does this apply to?

This new policy applies to all full-time Covered Individuals who are not Institutional Officials.

Speakers Bureaus

A Partners Individual may not participate in a Speakers Bureau, which includes participation as a speaker, panelist, presenter, commentator, or other presenter in an Industry Promotional Event as defined by the Glossary. Any Partners Individual who has an existing agreement in place as of October 1, 2009 which does not comply with this policy must terminate the contract by January 1, 2010. In addition, the COI Committee shall define specific rules for participating in certain other promotional talks even when they do not constitute Speakers Bureaus or Industry Promotional Events.

Who does this apply to?

This new policy applies to all Covered Individuals, and all other Partners Individuals while acting in their Partners capacity.

Ghostwriting

A Partners Individual may be listed as an author on an article written by Industry representatives or others only if (1) the Partners Individual has made an appropriate level of contribution to the paper to merit authorship under academic authorship criteria, and (2) to the knowledge of the Individual, all others who contributed to the writing of the article such that their contribution merits authorship are also listed as authors.

Who does this apply to?

This new policy applies to all Covered Individuals, and all other Partners Individuals while acting in their Partners capacity.

Industry Support for Educational Programs – Targeted Grants

Effective May 1, 2010, industry may provide financial support or in-kind support to a Partners Educational Program, so long as such support (regardless of the amount) follows guidelines established by the Partners Education Review Board (ERB) and is approved by the ERB. The ERB may not approve such industry support unless all of the following conditions are met:

- financial support for a specific Partners Educational Program must come from more than one company; in-kind support for a specific Partners Educational Program may come from a single source;
- any continuing medical (and other health care profession) education program that involves conferences or lectures, or other forms of oral presentations, must meet

Accreditation Council for Continuing Medical Education or comparable standards (as determined appropriate by the ERB), regardless of whether the participants receive CME credit; and

- the Partners Educational Program shall be subjected to screening for conflicts of interest and monitoring of content (as determined appropriate by the ERB).

Who does this apply to?

This new policy applies to any industry support for a Partners Educational Program and to all Partners Individuals who administer or are otherwise involved in industry-supported Partners Educational Programs.

Glossary for interim Policy Statement on Interactions with Industry

Affiliated Corporations:

The Massachusetts General Hospital, The Brigham and Women's/Faulkner Hospitals, Inc., The North Shore Medical Center, Inc., Newton-Wellesley Hospital, and all of their respective affiliates; Partners Community Healthcare, Inc. ("PCHI"); Partners Continuing Care, Inc.; Partners Harvard Medical International, Inc., and Partners International Medical Services, Inc.

Company or Industry:

any for-profit corporation, partnership, sole proprietorship, organization, or other legal entity.

Covered Individuals:

"Medical/Professional Staff Members" and "Employee Members."

Medical/Professional Staff Members are individuals who are members of the medical or professional staffs of any Partners hospital and who have full- or part-time academic appointments at Harvard Medical School, or who are Service Chiefs at a Partners entity, or who are employed full- or part-time by a Partners entity. The term shall not include individuals who are not employed by a Partners entity, and who are members of the medical or professional staffs of any Partners hospital but whose primary academic appointment is at a non-Partners Hospital except for when they are operating at a Partners site or otherwise operating in a Partners capacity.

Employee Members are administrative staff, nurses, support personnel, and other full- or part-time employees of Partners or a Partners Affiliated Corporation who are not Medical/Professional Staff Members.

Industry Promotional Event:

any meeting or event which is sponsored or otherwise funded, directly or indirectly, by a Company where the Company has the contractual right to control what the Covered Individual says or otherwise has the final right of approval for content and edits of the Individual's presentation materials, or where the Covered Individual acts as the Company's spokesperson. The Committee on Conflicts of Interest may define certain limited categories of Company control (e.g., relating to FDA compliance or other matters) that will be considered acceptable.

Institutional Officials:

presidents and chief executive officers; officers and executives at and above the vice president level; department chairs; and other senior officials designated by the president/CEO of Partners and each Affiliated Corporation.

Partners Educational Program:

any clinical training program (e.g., fellowship, residency), or any endeavor designed to provide educational information to healthcare practitioners (physicians, nurses, residents, fellows, etc.), non-physicians, non-professional staff, researchers, patients, and/or the public, regardless of whether the participants receive credit for their participation.

Partners Individuals:

any trustee, director, officer, executive, full- or part-time medical or professional staff member or employee of a Partners Affiliated Corporation (other than PCHI), any member of a Partners committee, and any consultants, independent contractors, students, trainees, sponsored staff or other individuals acting in a Partners capacity.

In the case of people affiliated with PCHI, only the following shall be considered "Partners Individuals" under this Policy: (i) PCHI Trustees, officers, executives, and members of PCHI committees with board-delegated powers; (ii) people (physician and non-physician) actually employed by PCHI; (iii) physicians who have an appointment to the professional staff of a Partners-affiliated hospital; and (iv) other people (physicians and non-physicians) who in the judgment of the Chief Executive Officer of PCHI have significant PCHI-related management responsibilities.

Speakers Bureau:

(1) any arrangement or speaking engagement that is termed a "Speakers Bureau;" (2) a list maintained by a Company (whether called a "Speakers Bureau" list or some other name) which is used by the Company to retain, or recommend to a third party that it retain, the Covered Individual as a speaker, on which the Individual has given permission or knowingly allowed his/her name to be included; or (3) any participation as a speaker, panelist, presenter, commentator, or other presenter in an Industry Promotional Event.