

# TRADITIONS BEHAVIORAL HEALTH PHARMACEUTICAL INDUSTRY RELATION POLICY

## PURPOSE

Traditions Behavioral Health aims to provide evidence based psychiatric services and behavioral healthcare that is free from undue industry influences. Doctors' interactions with the pharmaceutical industry (PHARMA) need to be explicitly defined and disclosed. Any circumstance that may give rise to a conflict of interest or commitment must be acknowledged and managed appropriately.

Traditions Behavioral Health wishes to avoid even the appearance of conflict of interest and follow the guideline of transparency and disclosure.

## POLICY

Traditions Behavioral Health and its doctors will not accept gifts.

Gifts are defined as, but not limited to: free food and meals, pens, note pads, tote bags, free or discounted items, payment to attend meetings and travel or other activities when the physician receiving the payment is not providing a service of equal or greater value.

Professional pharmaceutical samples are not included in "gifts." Samples will only be used for distribution to needy patients who may benefit from the medication. Samples will be maintained in a pharmacy and will be monitored and managed by the pharmacist of the facility where the physician works. This exception is designed to help patients of low income and indigent patients who otherwise would not be receiving state of the art treatment.

Traditions Behavioral Health and its doctors will not solicit or accept any personal services or considerations from pharmaceutical companies or their representatives. Examples of personal services and considerations will be travel, tickets to special events or personal dinners unrelated to professional meetings or education.

### **Consulting and speaking activities of physicians**

Any activities by TBH doctors for PHARMA need to be approved by TBH's president and reviewed by a subcommittee of TBH Medical Directors charged with monitoring the professional and ethical standards of such activities.

PHARMA may wish to seek to engage physicians who have expertise in the conduct of clinical trials, data gathering, data interpretation, the policies governing the approval process for

new drugs and other knowledge related to pharmaceutical industry and specific medications, to provide services. Such physicians may be asked by PHARMA to present new data to physicians who are not familiar with emerging findings that might be important for their practice. The physician will not present any data that have not been vetted and approved by the Food and Drug Administration. Any material that may be used for presentations must be accurate, balanced and consistent with FDA approved indications.

Physicians employed by TBH will not perform any kind of work or give any presentations for pharmaceutical industry during working hours. PHARMA may reimburse the physician for expenses, travel and provide an honorarium for any presentations approved by TBH's president and reviewed by a subcommittee of TBH Medical Directors charged with monitoring the professional and ethical standards of such activities. Physicians will disclose any payments for expenses or honoraria received to TBH.

### **Visits by pharmaceutical representatives**

Traditions Behavioral Health will work with the institutions where the doctors are placed to be in complete compliance with the institutional guidelines with regard to pharmaceutical industry visits, and provision of samples.

## **DISCLOSURE OF RELATIONSHIPS WITH INDUSTRY**

Traditions Behavioral Health and its doctors are working in a variety of settings which may have variable policies with regard to interaction with PHARMA representatives. Traditions Behavioral Health will take into consideration the policies and regulations that various settings may have with regard to interaction with PHARMA. TBH physicians are expected to adhere to the policies.

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