

Policy Name: GME Vendor Interactions	
Originating Officer (Title), Council, or Committee: Graduate Medical Education Committee	Effective Date: April 1, 2025
Approved By: Shelly Monks, Vice President and Chief Academic Officer, Designated Institutional Official	Last Reviewed Date: April 1, 2025
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1.0 Scope:

1.1 Applicable Entities:

This policy applies to:

- Texas Health Resources (Texas Health) and its member entities
- Excludes the Texas Health joint venture entities (except those listed in the Formulation and Adoption of System-Wide Policies and Procedures in Section 4.1.6 or in Section 4.1.7)

1.2 Applicable Departments:

This policy applies to all Texas Health Graduate Medical Education residents and fellows (hereafter referred to as Trainees) employed by Texas Health Resources ("Institution").

2.0 Purpose:

2.1 The purpose of this policy addresses Trainee behavior and relationships with vendors in educational contexts, which may include clinical training sites. The purpose of this policy is to ensure that graduate medical education activities at Texas Health are not compromised through vendor influence, collectively or through individual interactions. This policy excludes vendors approved by entities/departments such as the THR Foundation, Human Resources, or Supply Chain to engage with Trainees.

2.2 This policy does not pertain to personal gifts exchanged on an individual basis.

2.3 Any gifts given to or accepted by Trainees in a professional capacity should be appropriate in nature and comply with applicable ethical and organizational guidelines and policies.

3.0 Policy Statements:

3.1 At Texas Health, we are committed to creating a workplace where diversity is celebrated, and inclusion exists at all levels. As such, Texas Health does not tolerate discrimination in any form or any behaviors that are incompatible with our core values – Respect, Integrity, Compassion, and Excellence and Our Texas Health PromiseSM.

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4.0 Provisions:**4.1 Vendor Gifts**

- 4.1.1 Trainees must recognize that gifts to healthcare providers from vendors create conditions that can carry the risk of subtly biasing – or being perceived to bias – professional judgment in the care of patients. To preserve the trust that is fundamental to the patient-provider relationship and public confidence in the profession, Trainees should:
- a. Decline cash gifts or cash equivalent in any amount from a Vendor.
 - b. Decline any gifts for which reciprocity is expected or implied.

4.2 Vendor Sponsorship of Educational Activities On-Site

- 4.2.1 Vendors shall not solicit Trainees while at Texas Health entities.
- 4.2.2 Vendors may not distribute marketing literature or set up booths in or around educational venues or onsite except during an educational event approved by Hospital Leadership, the Program Director or DIO.
- 4.2.3 No gifts, free samples, books or promotional materials with the manufacturer, drug, or device name imprinted shall be distributed or made available at educational events.

4.3 Vendor Sponsorship of Educational Activities Off-Site

- 4.3.1 Any attendance at an educational activity for which a vendor has sponsored the attendance of a trainee must be approved in advance by the Program Director and Chief Academic Officer.
- 4.3.2 Trainees may attend Vendor-sponsored social events connected to educational conferences or programs, provided that these events are modest in nature and appropriate in the normal course of business. This includes meals, receptions, and/or entertainment, all of which should not be lavish or excessive.

4.4 Trainees should generally only attend Vendor-sponsored events if they are open to all conference attendees. Vendor Sponsored Research

- 4.4.1 To ensure alignment with institutional policies and standards, all Vendor-sponsored research involving Trainees must be reviewed and approved through the Texas Health Research Institute prior to initiation.

4.5 Vendor Training on Equipment

- 4.5.1 At the discretion of the Program Director, Vendors may sponsor Trainees training on equipment. In such cases, the Vendor is present as a consultant and must solely provide instruction on the specific device and should not be allowed to market other products.

4.6 Program Monitoring of Trainee-Vendor Representative Interactions

- 4.6.1 Program leadership should be aware of and discuss with Trainees any interaction with representatives from Vendors, so any contacts are within the scope of this policy. Interactions that appear to place the Trainees in a

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position of obligation to or influence by the Vendor should be explicitly discouraged.

5.0 Definitions:

5.1 DIO – Designated Institutional Official

5.2 ACGME – Accreditation Council for Graduate Medical Education

5.3 Graduate Medical Education Committee (GMEC) – Responsible for policy and oversight Graduate Medical Education.

5.4 Resident/Fellow – Trainee in a sponsored Graduate Medical Education program.

Vendor – Supplier of capital items, supplies or services. Examples include sales representatives for pharmaceutical supplies, medical devices, post-acute providers, insurance and financial advisors.

6.0 Responsible Parties:

6.1 Graduate Medical Education Committee

6.1.1 Implementation and oversight of the policy is the responsibility of the Program Director and the Graduate Medical Education Committee.

7.0 External References:

[ACGME Policies and Procedures](#)

8.0 Related Documentation and/or Attachments:**9.0 Required Statements:**

Not Applicable