

I. Introduction

Relationships between commercial entities and academic medical centers have become increasingly intertwined and complex. The substantial financial assets of corporations and the broad intellectual resources of academic centers create natural opportunities for joint pursuit of common objectives. Yet occasionally the commitments and fiduciary duties of industry may conflict with Mount Sinai's core scientific and educational missions. Furthermore, while offers of "free" goods, gifts, donations or grants for teaching programs may serve a beneficial purpose, they may violate the federal Anti-Kickback Statute and similar New York State laws. These laws prohibit the knowing solicitation or receipt, offer or payment of anything of value in return for patient, product or service referrals and punish any violator with significant fines, jail terms and exclusion from federal and state health care programs. In light of these potentially conflicting missions and regulatory prohibitions, it is critical that all members of the Mount Sinai community remain acutely sensitive to avoiding any actual or perceived conflict of interest.

Mount Sinai does business with corporations associated with a wide range of activities, including but not limited to: the sale of products and services to the institution; referral and receipt of patients for health care services; and sponsorship of scientific research. Vendors include: pharmaceutical, biotechnology, office supply, and medical device/supply companies; research supply and equipment companies; building contractors; consultants; medical service providers; billing and collection companies; and other service companies. For purposes of this policy, the term "vendor" encompasses all commercial entities that do business with Mount Sinai and its faculty, staff, and trainees.

All decisions relating to purchasing or other business processes must promote the best interests of Mount Sinai without favor or preference based on personal considerations. All actions must reflect Mount Sinai's commitment to the highest ethical standards of conduct as described in the Compliance Manual (intranet) (<http://intranet1.mountsinai.org/compliance/>) and the Code of Ethics and Business Conduct (<http://intranet1.mountsinai.org/compliance/home.asp>) and must be consistent with all institutional policies, including but not limited to the Section 16 - Purchasing Policy (</sites/MSSM/default/about/finance>), the Policy on Business Conflicts of Interest and policies in the Faculty Handbook (</sites/MSSM/default/about/faculty-resources/handbook>), e.g., Financial Arrangements with Extramural Entities (</sites/MSSM/default/about/faculty-resources/handbook/faculty/full-time>) and Use of Mount Sinai Name Guidelines (</sites/MSSM/default/about/faculty-resources/handbook/institutional/name-usage>) promulgated by the Federal Office of the Inspector General (OIG) ([file_source/ISMMS/Assets/About the School/Faculty-Resources/050503FRCPGPharmac.pdf](file_source/ISMMS/Assets/About%20the%20School/Faculty-Resources/050503FRCPGPharmac.pdf)) and the PhRMA Code (<http://www.phrma.org/about/codes-and-guidelines>) must also be observed.

Maintaining rigorous practices will ensure our commitment to the well-being of our patients, the integrity of our research and the soundness of our educational programs. The following guidelines apply to all faculty, staff, and trainees of Icahn School of Medicine, The Mount Sinai Hospital, and The Mount Sinai Health System, and are designed to assist in avoiding potential conflicts of interest between Mount Sinai and industry.

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