

ASHP Policy on Accepting Corporate Support and Avoiding Conflicts of Interest

Approved by the ASHP Board of Directors, September 17, 2015

Introduction

This document states ASHP's philosophy and guiding principles with respect to corporate support* from pharmaceutical companies and other for-profit corporations** and for avoiding conflicts of interest in pursuing its work as a nonprofit professional and scientific association. These principles have evolved over many years, during which ASHP developed constructive relationships with for-profit businesses while maintaining a high standard for independence and integrity. Corporate support has permitted ASHP to initiate and enhance programs that help it achieve its purposes and fulfill its mission (Appendix A).

One of ASHP's most valuable assets is its reputation for independence and integrity in expressing the voice of pharmacists who serve as patient care providers in acute care and ambulatory settings.. ASHP is vigilant in ensuring that its relationships with business entities never compromise this asset and that its volunteer leaders and staff do not have conflicts of interest.

* "Corporate support," for purposes of this document, encompasses the full range of relationships between ASHP and for-profit corporations, including the purchase of services, grants for educational programs, and sponsorship of activities.

**This document reflects the perspective of ASHP as a nonprofit professional and scientific association; other considerations apply to the ASHP Research and Education Foundation, a separate charitable, philanthropic organization.

Guiding Principles

1. Any corporate support must help advance ASHP's mission and purpose.
2. Any activity for which corporate support is accepted must be under ASHP's complete control.
3. ASHP does not permit corporate support to compromise its independence and integrity. ASHP rigorously evaluates each prospective or potential supporter in relation to its alignment with ASHP's mission, purpose and policies, as well as with related criteria prior to accepting any corporate support. ASHP further reserves the right to decline any offer of support from any potential source.
4. ASHP is transparent in its acceptance of any corporate support; the identity of the corporate supporter is noted prominently with the activity that is being supported.
5. ASHP does not accept corporate support for *AHFS Drug Information*, core educational sessions at the ASHP Midyear Clinical Meeting or the ASHP Summer Meetings, or any activity related to governance, strategic planning, policy development (including practice standards), or advocacy.

6. ASHP will only accept financial support from an entity if the proposed activity to be funded is under ASHP's control. ASHP acceptance of corporate support does not imply ASHP endorsement of the supporting entity or any of its activities. ASHP does not endorse specific commercial products or services of any entity not legally related to ASHP.
7. ASHP follows standard business practices in facilitating corporate access to its members through advertising in its publications and exhibiting at its conferences.
8. ASHP accepts grants to conduct independent educational programs (including the publication of educational supplements in the *American Journal of Health-System Pharmacy*) in compliance with the accreditation standards of the Accreditation Council for Pharmacy Education or the Accreditation Council for Continuing Medical Education.
9. ASHP accepts grants to conduct activities that foster the advancement of pharmacy practice (such as a Web resource center or survey).
10. ASHP accepts sponsorship for social functions and other selected meeting services and activities for conference attendees; ASHP retains complete control over such functions, services, and activities. ASHP discloses the sources of external support for all sponsored ASHP activities.
11. ASHP requires members of the Board of Directors to disclose at least annually any potential conflicts of interest, including financial relationships that they have with any entity that supports ASHP activities, provides services to ASHP, is seeking ASHP business, or that may have an interest in influencing ASHP programs or policies. Disclosures by Board members are reviewed by the entire Board, and a Board member will recuse himself or herself from issues or activities for which he or she has a conflict of interest.
12. ASHP requires members of member committees that make recommendations to the Board of Directors to disclose annually any potential conflicts of interest, including financial relationships they have with any entity that supports ASHP activities, provides services to ASHP, is seeking ASHP business, or that may have an interest in influencing ASHP programs or policies. ASHP maintains a process for determining, based on committee-member disclosure, if a conflict of interest exists and for ensuring that no committee member is involved in decisions for which he or she has a conflict of interest.
13. ASHP requires all corporate officers and selected professional staff members to disclose annually any potential conflicts of interest, including financial relationships they have with any entity that supports ASHP activities, provides services to ASHP, is seeking ASHP business, or that may have an interest in influencing ASHP programs or policies. ASHP maintains a process for determining, based on staff-member disclosure, if a conflict of interest exists and for ensuring that no staff member is engaged in an ASHP program for which he or she has a conflict of interest.

14. ASHP prohibits any elected official or staff member from soliciting or accepting gifts or amenities of a material nature from any entity that supports ASHP activities, provides services to ASHP, is seeking ASHP business, or that may have an interest in influencing ASHP programs or policies.
15. ASHP publishes the ASHP Policy on Accepting Corporate Support and Avoiding Conflicts of Interest on its website and invites anyone to bring to the attention of the ASHP Chief Executive Officer or the ASHP President any related questions about any ASHP activity.
16. The ASHP Chief Executive Officer is responsible for implementing procedures to ensure compliance with the ASHP Policy on Accepting Corporate Support and Avoiding Conflicts of Interest.
17. The ASHP Board of Directors reviews the ASHP Policy on Accepting Corporate Support and Avoiding Conflicts of Interest at least every two years and reaffirms or revises the policy as may be indicated.

Background and Interpretation

Contemporary Legal and Public Affairs Context

For several years there has been growing pressure by federal and state governments as well as the public for greater disclosure, transparency, and accountability by corporations about the sources and uses of their funds.

Given this environment, there has been increased scrutiny of the pharmaceutical and related industries and their spending practices. One specific area that has been investigated is the level of corporate support these companies provide to health professionals and professional associations for a variety of educational activities and other programs, and whether these activities influence health professionals about drug decisions. ASHP has also developed guidelines for pharmacists on relationships with industry and activities with vendors' representatives.

ASHP receives corporate/commercial support from the pharmaceutical, medical device, and other related industries for its activities and programs in the form of educational grants, sponsorship programs, advertising, meeting exhibits, and personnel placement. This corporate support enables ASHP to conduct educational programs and other professional activities on a wide range of professional practice issues for its members. At the same time, this corporate support may raise concerns about potential influence or monetary dependence that may occur for ASHP as a result of receiving this type of support. However, ASHP takes appropriate measures to ensure that corporate support does not influence ASHP activities, policies, or decisions.

It is against this backdrop that the maintenance of an ASHP policy on acceptance of corporate support for ASHP educational, professional, and business activities is necessary in order to protect the integrity and reputation of the organization and of ASHP as the professional society of pharmacists who as patient care providers in acute care and ambulatory settings.

Distinctions among Grants, Sponsorship, and Purchase of Association Services*

ASHP receives corporate support from the pharmaceutical and related industries for certain activities and programs. Some of this corporate support is for professional development and educational programs, and some of it consists of the purchase of standard business services that associations like ASHP provide.

Professional Practice and Educational Activities

ASHP solicits and obtains educational grants from commercial interests for selected professional and educational activities. These activities include, but are not limited to, professional development (*i.e.*, practice surveys, awards), journal supplements, continuing education programs, and other ASHP-initiated professional projects and symposia (*i.e.*, specialty educational conferences). In recent years the health care industry has changed its policies and procedures for the distribution of and accountability for educational grants. There is now a strict separation between monies used for marketing/promotional activities and funds given for professional/educational programs. This separation is primarily in response to the concerns about corporate influence and bias. These educational grants no longer originate from the promotional/marketing side of the corporation, and all companies that distribute educational grants do so from a separate division of the company. For continuing professional education activities, the use of these grants must comply with the requirements of the Accreditation Council for Pharmacy Education or the Accreditation Council for Continuing Medical Education. For example, the grantor is not permitted to have a role in program development or delivery or in the selection of speakers and may be recognized only through acknowledgement of the grant support. The recipient of the grant must adhere to the proposed budget for the educational activity and provide a detailed reconciliation of expenditures at the conclusion of the educational program to the grantor.

Sponsorship

ASHP receives corporate support as sponsorship of non-educational activities such as bussing expenses during a convention, meeting attendee bags, name-badge lanyards, and selected social events. The sponsoring company pays ASHP a fixed dollar amount in exchange for the sponsoring company's name and logo being acknowledged in conjunction with the activity. The promotion of specific drug names or product lines is prohibited in the context of sponsorship.

Standard Business Activities of Associations

Another area of corporate support involves the purchase of exhibit space at the ASHP Summer Meetings and Midyear Clinical Meeting. The purchase of exhibit space allows the exhibiting company to educate ASHP members about the products and services of the specific company. ASHP has specific published guidelines (Appendix B) for the types of companies that may exhibit at its meetings and the information that may be presented. Information presented in exhibits must also comply with FDA regulations. Solicitation of business, order taking, and selling activity are prohibited on the exhibit floor.

Another revenue source for ASHP is commercial advertising in the *American Journal of Health-System Pharmacy (AJHP)* and in other media. ASHP has had a statement of advertising policy (Appendix C) since 1972, and it addresses the type of advertising content that will be accepted. ASHP additionally has an Online Advertising Policy, which is posted on its website at <http://www.ashp.org/DocLibrary/AboutUs/Advertising/Online-Advertising-Policy.aspx>, and is consistent with the spirit of its print advertising policy. While these types of activities can be viewed as educational for ASHP members, advertising is considered a "commercial" or business activity by the Internal Revenue Service. Likewise, participation in ASHP's career placement service by the pharmaceutical industry is considered a business service.

Trends

Regardless of the types of professional or business support received by ASHP, in the interests of transparency, a greater number of public disclosures about these types of corporate support continue to be made by the pharmaceutical industry as well as by ASHP as the recipient. Pharmaceutical companies continue to voluntarily and publicly disclose grants, donations, sponsorships, and other interactions with health professionals. Likewise, tax-exempt organizations such as ASHP are being required to increase disclosures on their IRS Forms 990 about their activities and programs, including how they are funded, and the sources of funding. ASHP biannually posts a list of companies from which ASHP has received corporate support for continuing pharmacy and medical education. The list may be found at <http://www.ashp.org/DocLibrary/AboutUs/Companies-that-Receive-Corporate-Support.aspx>

*These categories of support can be further distinguished by their varied tax treatment under the Internal Revenue Service code. Educational grants are exempt from taxation as long as they are directly related to the exempt purpose of the organization. Sponsorship activities are exempt from taxation as long as they comply with IRS criteria for sponsored activity. Advertising and career placement services are taxable revenue. Exhibit income is nontaxable if held in conjunction with an annual convention.

Principles in Seeking and Accepting Educational Grants and Sponsorship

Educational Grants

ASHP seeks and accepts educational grants from corporations. In doing so, ASHP strictly adheres to all applicable policies, regulations, and standards, including ASHP policies, the Accreditation Council for Continuing Medical Education (ACCME) Essential Areas and Standards, FDA Guidelines for Industry-Supported Scientific and Educational Activities, the Accreditation Council for Pharmacy Education (ACPE) Accreditation Standards for Continuing Pharmacy Education, and the Pharmaceutical Research and Manufacturers of America (PhRMA) Code on Interactions with Healthcare Professionals. Interactions are guided by the following principles:

1. ASHP maintains written policies governing its acceptance and administration of commercial support for educational activities.
2. All interactions with commercial supporters are transparent.
3. All interactions are conducted in an open and honest manner and within applicable laws and regulations.
4. ASHP maintains control over all aspects of its educational activities, including content, subject matter, faculty selection, and delivery.
5. ASHP maintains ownership of all rights associated with its educational materials, including copyright.
6. Activities supported through educational grants must benefit ASHP members or the delivery of health care.
7. Activities supported through educational grants must preserve ASHP's independence and integrity.
8. Educational grants are used for scientific and educational purposes only and not for the purpose of promoting a product or service. Funding of a program with an educational grant does not imply endorsement of the grantor or its policies.
9. An educational grant must not include any type of influence by the grantor over ASHP.
10. Multiple commercial supporters for a specific project will be sought whenever feasible.
11. ASHP does not accept commercial support for AHFS Drug Information, core educational sessions at the Midyear Clinical Meeting or the Summer Meetings, or any activities related to governance, strategic planning, policy development (including practice standards), or advocacy.
12. ASHP discloses to faculty and participants any external funding received for an educational activity or product.
13. ASHP requires a signed letter of agreement for all educational grants stipulating the independence of the educational activity, ASHP's control over all aspects of the educational content, and the commercial supporter's agreement to comply with all applicable standards and regulations.
14. ASHP maintains an internal separation or "firewall" to ensure that staff members involved in developing educational content do not engage in discussions regarding a grantor's marketing or promotional strategies.

Sponsorship

ASHP seeks and accepts commercial sponsorship for selected activities. In doing so, ASHP strictly adheres to all applicable policies, regulations, and standards, including ASHP policies, the Pharmaceutical Research and Manufacturers of America (PhRMA) Code on Interactions with Healthcare Professionals, and governmental regulations. Commercial support from industry makes possible added member services. Interactions with sponsors are guided by the following principles:

1. ASHP maintains written policies governing its acceptance and administration of commercial sponsorship.
2. All interactions with industry sponsors are transparent.
3. All interactions are conducted in an open and honest manner and within applicable laws and regulations.
4. ASHP maintains control over content, copyright, and the use of the ASHP logo related to any sponsored activity.
5. ASHP maintains ownership of all rights associated with the sponsored activity.
6. Sponsorship of an ASHP activity does not imply ASHP endorsement of the sponsor or its products or policies.
7. The sponsor must not exert any type of influence over ASHP.
8. The sponsorship must maintain ASHP's independence and integrity.
9. Multiple sponsors for a specific activity will be sought whenever feasible.
10. ASHP does not accept sponsorship for AHFS Drug Information, core educational sessions at the Midyear Clinical Meeting or the Summer Meetings, or any activities related to governance, strategic planning, policy development (including practice standards), or advocacy.
11. ASHP discloses any external sponsorship of its activities.
12. ASHP requires a signed letter of agreement with sponsors stipulating ASHP control over all aspects of the activity, including content, publicity, venue, and the sponsor's promise to comply with all applicable standards and regulations.
13. ASHP maintains an internal separation or "firewall" to ensure that staff members involved in developing the sponsored activity do not engage in discussions regarding a sponsor's marketing or promotional strategies.

Multiple-Company Support of Educational Activities

The traditional model for commercial support of educational activities involves a single commercial supporter providing grant support for a single educational activity. While this model continues to be appropriate, support from multiple sources for a single educational activity ("multi-supported" education) is sometimes a preferred model.

A number of benefits to multi-supported education have been suggested, including a reduction of cost to the individual commercial supporter, allowing broader funding of educational projects; added assurance of independence of the educational activity; elevated perception of the quality and integrity of the educational activity among

participants and faculty; and preference among commercial supporters associated with a potential reduction in their legal risk.

ASHP considers the appropriateness and feasibility of seeking support from more than one source, particularly when the project for which support is being sought will include discussion of health care treatments, products, or services used by patients; when more than one potential source of funding can be identified; and when there is potential for participants to perceive bias or commercial influence.

Avoidance of Conflicts of Interest (COI) by the ASHP Board of Directors

For many years the ASHP Board of Directors has maintained a formal board policy on conflict of interest, disclosure and external business/professional activities by members of the Board as components of their fiduciary duties (Duty of Care and Loyalty). This policy has been updated on several occasions. One aspect of the Duty of Loyalty which is relevant to a discussion concerning external corporate support at ASHP involves disclosure of outside activities by Board members. As part of the Duty of Loyalty a Board member has a continuing obligation to provide written disclosure to ASHP of outside interests, because these outside activities may give rise to serious concerns or perceptions that the outside activity will:

- “1) bias or influence the individual’s decision making regarding a program, policy or activity under consideration by ASHP, or
- 2) create an unfair competitive advantage for any individual person or outside organization ...”

[ASHP Policies on Conflict of Interest, Disclosure, and External Business/Professional Activities, 2015]

It is not unusual for a pharmacist elected to the ASHP Board to have other concurrent professional and business interests. Many of these other interests involve the pharmaceutical/medical device industry or other related corporations. Some of these other professional interests may involve potential or perceived conflicts of interest. ASHP and the Board are proactive in managing these potential conflicts of interests. In certain instances, a Board member may stop completely an activity for the duration of his or her term on the ASHP Board. In other situations, a Board member may decide not to participate in discussions and votes on actions before the Board where a potential COI or bias exists.

Consistent with current trends for increased transparency and accountability by corporations and their Boards of Directors, the protective measures taken by the ASHP Board have become more specific. For example,

1. Members of the Board avoid acceptance of honoraria or other remunerations from related industries, and when offered, an honorarium is directed to a 501(c)(3) organization.

2. Members of the Board avoid direct participation in ASHP or external business or educational programs in order to avoid concerns or perceptions that these outside activities are competing with or influencing ASHP products, services, or other membership activities.
3. Members of the Board avoid the receipt of remuneration, gifts, gratuities, or other favors from entities or organizations outside of ASHP that could influence (or be perceived to influence) an individual Board member's judgment or decisionmaking at ASHP.
4. Members of the Board postpone professional consulting arrangements and participation on advisory panels with related industries while a member of the ASHP Board unless they are unrelated to ASHP activities, programs, or professional policies.

The Board policy on COI and external business activities has evolved over many years, and it is expected that it will continue to be revised on a regular basis as the legal, ethical, and professional environment dictates.

Avoidance of Conflicts of Interest (COI) by ASHP Committee Members

ASHP, for many years, had COI policies and procedures for members of executive committees of sections and forums and for the Council on Therapeutics. These policies and procedures were expanded to cover all ASHP member committees that make recommendations to the Board of Directors.

Avoidance of Conflicts of Interest (COI) by ASHP Staff

Disclosure of potential COI by ASHP staff, for many years occurred through separate mechanisms beginning with the employment application process, provisions in the Conditions of Employment (which is signed by every employee when they are hired), the ASHP Personnel Handbook, and the internal ASHP Policies and Procedures. These documents describe behaviors that are expected of ASHP staff. In addition, there is a Board approved policy on the Editorial Independence of AHFS Drug Information (Appendix D), which outlines principles of conduct for the AHFS staff. On a yearly basis, the auditor of ASHP financial records requires a separate disclosure of external activities and interests by ASHP staff. ASHP has implemented additional policies and procedures to ensure that no staff member is engaged in an ASHP program for which he or she has a conflict of interest.

Accrediting bodies for continuing education (Accreditation Council for Pharmacy Education and the Accreditation Council for Continuing Medical Education), governmental agencies (Food and Drug Administration, Office of Inspector General), industry voluntary standards (such as by the Pharmaceutical Research and Manufacturers of America), and others have policies, regulations, and guidelines that must be followed to be in conformance with the ASHP Policy on Accepting Corporate Support and Avoiding Conflicts of Interest.

ASHP Purposes

Excerpted from the ASHP Charter.

The purposes for which ASHP is formed are as follows:

1. To advance public health by promoting the professional interests of pharmacists practicing in hospitals and other organized health care settings through:
 - a. Fostering pharmaceutical services aimed at drug-use control and rational drug therapy.
 - Developing professional standards for pharmaceutical services.
 - b. Fostering an adequate supply of well-trained, competent pharmacists and associated personnel.
 - c. Developing and conducting programs for maintaining and improving the competence of pharmacists and associated personnel.
 - d. Disseminating information about pharmaceutical services and rational drug use.
 - e. Improving communication among pharmacists, other members of the health care industry, and the public.
 - f. Promoting research in the health and pharmaceutical sciences and in pharmaceutical services.
 - g. Promoting the economic welfare of pharmacists and associated personnel.
2. To foster rational drug use in society such as through advocating appropriate public policies toward that end.
3. To pursue any other lawful activity that may be authorized by ASHP's Board of Directors.

ASHP Vision and Mission

ASHP's vision is that medication use will be optimal, safe and effective for all people all of the time.

The mission of pharmacists is to help people achieve optimal health outcomes. ASHP helps its members achieve this mission by advocating and supporting the professional practice of pharmacists in hospitals, health systems, ambulatory care clinics, and other settings spanning the full spectrum of medication use. ASHP serves its members as their collective voice on issues related to medication use and public health.

ASHP Policies Governing Exhibits: Eligibility, Content, Staffing, Booth, Sales and Other Activities

Excerpted from the ASHP Rules and Regulations Governing Exhibits, 2014 Midyear Clinical Meeting, Anaheim, California, December 2014. A complete copy of this document is available upon request or on the ASHP Web site.

Eligibility for Exhibiting

The following qualifications are required of all exhibitors at the 2014 ASHP Midyear Clinical Meeting to be held at the Anaheim Convention Center:

1. Products or services displayed must further the educational purpose of the Midyear Clinical Meeting and Exhibition to provide an atmosphere conducive to exchanging information and views about pharmacy practice, healthcare and other matters related to attendees.
2. Products or services must be related or of interest to pharmacy practitioners in hospitals and health systems or other related venues.
3. ASHP reserves the right, in ASHP's sole judgment, to determine eligibility or compatibility of any company or its products to exhibit at this event.

No Sales Policy

Because of the educational nature of the exhibit program, solicitation of business, all order taking, selling activity, conferences in the interest of business and similar activity on the exhibit floor is expressly prohibited and will be strictly and actively enforced.

Activity within the Exhibit

Any activity within the exhibits, including, without limitation, distribution (free of charge or otherwise) of any literature, product, or any other item must conform to the educational and professional nature and character of the meeting. ASHP reserves the right to prohibit and require immediate cessation of any activity or distribution that, in ASHP's sole discretion, is determined not to conform to the educational nature of the exhibits. ASHP will provide advance approval of activities and items upon request of an exhibitor. The Society's decision to prohibit and require cessation of any activity will be at the sole and exclusive discretion of ASHP and will be final.

Contests, lotteries, raffles, or games of chance are strictly prohibited unless approved by ASHP. The rights and benefits hereunder are personal to exhibitors and may not be assigned without the express written consent of ASHP. All exhibits must conform strictly to the Rules and Regulations. ASHP reserves the right to restrict any exhibit that might be considered undesirable. This restriction includes, but is not limited to, specific items, conduct, dress of personnel, printed matter, or anything objectionable to the exhibit or exhibit program as a whole.

Staffing of Exhibits

Exhibit booths must be staffed during all exhibit hours by qualified personnel of the exhibiting company who must be able to explain or demonstrate the products or services on display. Exhibitor assumes all responsibility for its exhibit personnel, employees, contractors, servants, agents, and for all persons admitted to the exhibit area using its Exhibitor's badge. All exhibitors are responsible for informing their own personnel and authorized representatives of these rules and regulations.

Use of ASHP Logo

Exhibitors will not use the ASHP logo, the name of ASHP, or in any manner associate any exhibit or any activity during the Midyear Clinical Meeting with ASHP without the express written and personal consent of its exhibit manager.

Other Rules and Regulations

Exhibitors will not discriminate against any person on account of race, creed, color, sex, religion, national origin, or physical or mental disability.

ASHP Policy on Acceptance of Advertising

Am J Health-Syst Pharm. 2007; 64:996.

Approved by the ASHP of Directors, November 20, 1991. Supersedes the document entitled "Statement of Advertising Policy of the American Society of Hospital Pharmacists," which was approved March 2, 1972. The policy is republished periodically for the information of AJHP readers.

The American Society of Hospital Pharmacists seeks to promote and elevate the professional practice of pharmacy and to improve pharmaceutical care to patients served by hospitals and health-care systems. In pursuit of these objectives, ASHP strives to increase the dissemination of pharmaceutical and related knowledge by providing for the interchange of information through its publications.

Recognizing that advertising is an important medium of information, ASHP, in keeping with its objectives, strives to ensure the accuracy, comprehensiveness, timeliness, and relevancy of the advertisements it accepts in its publications.

The following general principles are criteria that will be followed in the acceptance of advertising. ASHP reserves the right to modify these principles in the light of developments in the profession, the industry, or government regulations. The editor, with advice and assistance from the Committee on Publications when he or she deems necessary, makes the final decisions regarding the eligibility of all products and services to be advertised in ASHP publications.

Acceptance of advertisements by ASHP does not constitute endorsement, nor does it warrant in any way the safety, effectiveness, or quality of the products or services advertised.

The American Society of Hospital Pharmacists reserves the right to refuse advertising from any source or to reject any proposed advertisement.

Guiding Principles for Acceptance of Advertising

1. Advertising will be accepted, subject to editorial approval, for drug products as well as for pharmaceutical and other equipment, books, and other items or services used in hospitals and health-care systems.
2. Advertisers, by submitting advertising copy for publications, certify that it is in accord with applicable government regulations (for example, regulations covering new-drug applications and prescription drug advertising).
3. Advertisements that tend to limit the effectiveness of ASHP programs, or that promote concepts or practices that are contrary to an official policy of ASHP, will not be accepted.
4. Alcoholic beverages and tobacco products are not eligible for advertising.
5. Advertisements will not be accepted if they
 - a. Violate the principles of pharmaceutical ethics;
 - b. Are, in the opinion of ASHP, inappropriate, indecent, offensive, or reflect poor taste in text or illustration;
 - c. Contain attacks of a personal, racial, or religious character, or are libelous or otherwise contrary to law; or
 - d. Contain claims found by any court or federal or state agency to be invalid or in violation of law.
6. Sweeping superlatives, extravagantly worded copy, unfair comparisons, or the blatant and

- unwarranted disparagement of a competitor's product or service will not be allowed.
7. Advertisements that suggest a profit or personal benefit accruing to the pharmacist by the sale or recommendation of a product will not be permitted.
 8. Advertisements that offer free goods or premiums of any kind, and that clearly state that the availability of such premiums is contingent upon the purchase of products, will not be accepted.
 9. Advertisements should not be deceptive or misleading. Layout, artwork, and format should be such as to avoid confusion with editorial content.
 - a. ASHP reserves the right to place the word advertisement over advertising matter that simulates editorial content and is not clearly identified as advertising.
 10. The advertiser may be required to submit data in support of the usefulness or safety of its product or service and the validity of its claim.
 11. ASHP reserves the right to conduct an onsite review of a prospective advertiser's facilities.
 - a. No reference to such a review of facilities shall be permitted in advertisements, catalogues, promotional brochures, or other printed material.

ASHP Policy on Editorial Independence of AHFS Drug Information

Approved by the ASHP Board of Directors 2004.

The mission of *AHFS Drug Information (AHFS DI)* is to provide an evidence-based foundation for safe and effective drug therapy. Information included in *AHFS DI* shapes treatment decisions made by clinicians and influences public and private health care policy and decisions. As a result, it is important that the information be authoritative, objective, and free of undue influence from pharmaceutical manufacturers, health insurers, pharmacy benefits managers, and other third parties who may seek to use the compendium to promote their own vested interests. Editorial decisions are evidence-based and made independent of such third parties; final decisions are made solely by the AHFS editorial staff, taking into account the advice of expert reviewers. Widely trusted for its established record in refuting unfounded efficacy claims, its rigorous science-based editorial process, and its independence from the influence of pharmaceutical manufacturers, *AHFS DI* has remained true to its mission for almost 50 years.

AHFS DI is the only remaining official drug compendium published by a non-commercial entity (i.e., by a tax-exempt ["nonprofit"] professional association). The American Society of Health-System Pharmacists (ASHP) is an IRS 501(c)(6) tax exempt entity. ASHP is the national professional association that represents pharmacists who practice in inpatient, outpatient, home-care, and long-term-care settings. ASHP has a long history of fostering evidence-based medication use as well as patient medication safety—efforts designed to help pharmacists improve their delivery of pharmaceutical care.

AHFS DI is published by ASHP under the authority of its elected Board of Directors. As such, the Board exercises oversight through its ongoing Society considerations as well as through its Committee on Publications. This oversight by the Board also involves review and approval of relevant recommendations originating from its appointed Commission on Therapeutics and the advisory and best practices developments of its Councils, House of Delegates, and other policy-recommending bodies.

In addition, hundreds of experts, principally physicians but also other clinicians, leading medical scientists, pharmacists, pharmacologists, and other professionally qualified individuals, participate in an ongoing extramural review process for *AHFS DI*. Participation is solicited but voluntary, and no honorarium nor other benefit (e.g., complimentary subscription) is provided. These experts must provide full disclosure of interest, including any affiliation with or financial involvement in the manufacturer of the drug(s) under consideration and directly competitive products.

ASHP considers it essential that interactions between AHFS and pharmaceutical manufacturers be limited to the legitimate exchange of the scientific and medical information needed to fulfill the mission of *AHFS DI*. To maintain independence from the undue influence of the promotional interests of pharmaceutical manufacturers, communications are directed to the scientific and medical information areas within the companies; contact with marketing areas is avoided.

ASHP holds in high regard the responsibilities attendant to the public and private trust placed in the evidence-based editorial deliberations of AHFS. As such, ASHP also considers it essential to protect the integrity and independence of the editorial decisions of AHFS staff by separating the Society's business activities with pharmaceutical manufacturers (e.g., exhibits at educational meetings, journal advertising) from the editorial activities of its drug compendium. AHFS staff

apply the following principles of editorial independence in weighing the propriety of their conduct:

1. AHFS staff should avoid participating in business discussions with pharmaceutical manufacturers and other ASHP staff should avoid engaging AHFS staff in such discussions.
2. AHFS staff must disclose any potential financial conflicts of interest or other external activities that may affect their editorial decisions on specific drugs. AHFS staff should not hold financial interests that conflict or may influence the conscientious performance of their editorial duty.
3. AHFS staff may not solicit or accept any gift or other item of monetary value from any individual or entity seeking official action or influence from the compendium nor from those whose interests may be substantially affected by the performance or nonperformance of the staff's editorial duties.
4. AHFS staff have an obligation to act impartially and not give preferential treatment to any interested individual or organization that might influence their editorial decisions.
5. AHFS staff should avoid actions that might create the appearance that they are violating these principles of ethical conduct and editorial independence. Any such behavior shall be judged from the perspective of a reasonable individual in a similar situation with knowledge of the relevant facts. When necessary, the expert advice of other staff (e.g., professional practice, corporate counsel) should be sought.
6. On occasion, ASHP may determine that the Society's interest in the staff's participation in a particular activity or discussion outweighs any concern that a reasonable individual might question the integrity of the activity.
7. AHFS staff members with questions about their activities that are not addressed by these principles on editorial independence shall refer their questions to the Vice President of Publishing and Editor of AHFS.