Penn Medicine

Public Disclosure of Faculty Extramural Compensation

February 2009
Extramural Activities in Today’s Environment

- Extramural Activities are permitted by the University to a limited degree because they have the potential to enhance and expand our individual scholarship and move clinical/research/education practice forward.

- Extramural activities, however, are now under greater public and regulatory scrutiny given notable breaches of ethical behavior by others in the medical and scientific community.

- As physicians and scientists we have an obligation to our patients, research participants, funders and to the public at large to be transparent in all our outside activities.
National Activity on Disclosure

- Federal requirement for disclosure under consideration

- Pharma disclosing payments to faculty without federal requirement: Eli Lilly, Merck, GSK, Medtronic

- Academic Medical Centers are also moving to publicly disclose
  - Cleveland Clinic disclosure web site October 2008
  - Duke, Stanford, Emory, et al, preparing web-based disclosures

- Major professional organizations, AMA, AAMC, etc., & media outlets, JAMA, NEJM, NYT support public disclosure

- Inaccurate disclosures or failure to disclose related to conflicts of interest subject of many Federal reviews and sanctions
PENN MEDICINE ACTIONS TO DATE ON DISCLOSURES

- Advice to the faculty on what are permissible extramural activities under existing University policies

- Increased attention to appropriate completion of disclosure forms by faculty leadership

- Made commitment to web-based public disclosure of all compensated faculty extramural activities to be ready by July 1, 2009

  - Endorsed by CPUP Board of Directors, Standing Committee of Chairs & Institute Directors and Medical Faculty Senate Steering Committee
Data on the public web site disclosing faculty outside compensation will be taken from the required annual Extramural Disclosure Forms.

- 2009 extramural forms will be distributed on March 1, 2009, covering **calendar year 2008** to match tax documents.

- Going forward, reporting will be on calendar year basis.

  - Public disclosure of faculty compensated activities, regardless of source, will be provided in ranges:
    - Less than $10,000
    - $10,000 - $100,000
    - Over $100,000
    - Over $500,000
External activities categories from current disclosure forms

- Clinical Practices Outside of CPUP
- Consultant
- Continuing Medical Education not Sponsored by Penn
- Employee at another Organization
- Expert Witness/Medical Legal Work
- Extramural Teaching Activity
- Faculty Appointment at Another Institution
- Founder/Partner/Owner of a Business
- Invited Lecturer-Compensated
- Managerial/Executive, Officer, or Trustee
- Member, Advisory Board
- Member, Board of Directors
- Member, Editorial Board
- Visiting Professor
- Other (please specify)

Faculty are required to report ALL external compensation additional to University/SOM/CPUP compensation
<table>
<thead>
<tr>
<th>Physician</th>
<th>Outside Entity</th>
<th>Category of Relationship</th>
<th>Range of Compensation</th>
</tr>
</thead>
<tbody>
<tr>
<td>John Smith, MD</td>
<td>Merck Pharmaceutical</td>
<td>Consultant</td>
<td>$10,000 - $100,000</td>
</tr>
<tr>
<td>Jerry Shoe, PhD</td>
<td>Xeon, Inc.</td>
<td>Intellectual Property Compensation</td>
<td>$10,000 - $100,000</td>
</tr>
<tr>
<td>Mary Jones, MD</td>
<td>Johns Hopkins</td>
<td>Visiting professor/lecturer</td>
<td>Less than $10,000</td>
</tr>
</tbody>
</table>

Faculty will have opportunity to view and correct their listing prior to public disclosure.
Questions?

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