

## **Policy: Financial Conflicts of Interest**

**Albert Einstein College of Medicine** (Einstein) ensures objectivity, balance, transparency, and scientific rigor in all academic activities. Individuals employed as faculty by Einstein, otherwise employed and appointed to the Einstein faculty, or otherwise employed and identified as “Investigator” on an Einstein sponsored research protocol or grant, (“Obligated Disclosers”) are required to disclose financial interests or other relationships that may create (or create the appearance of) a conflict of interest, and are also required to help resolve such conflicts.

### **Information Pertaining to Conflict of Interest Disclosure**

**Disclosure:** Obligated Disclosers must report external Financial Interests (FI) of any dollar value, and Relationships with External Entities, at the time of appointment or hiring, in relations to certain “Events.” (See below for definitions and exclusions).

- **Financial Interests (FI)** include salary or remuneration for services regardless of dollar value.
- Disclosure also must include the **Significant Financial Interests (SFI)** of a **Related Party** (spouse, domestic partner, or dependent child).
- Disclosure must be complete, timely and truthful.

**Significant Financial Interests (SFI)** (Federal regulations require disclosure of **SFI** pertinent to federally funded research):

- With regard to a publicly traded entity, **SFI** exists if the value of any remuneration (salary or payment for services) from the entity in the twelve months preceding disclosure, and the value of any ownership interest in the entity as of the date of disclosure, when aggregated, exceeds \$5,000.
- With regard to a non-traded entity, **SFI** exists if the value of any remuneration (salary or payment for services) entity in the twelve months preceding disclosure, when aggregated, exceeds \$5,000, or when the investigator or related party holds **ANY** equity interest.
- Intellectual property rights and interests (*e.g.* patents, copyrights).
- Disclosure must be updated within 30 days if any new remuneration from or ownership interest in an entity results in an aggregated value of \$5,000 or more.