Conflict of Interest: Definitions and Requirements

The Albert Einstein College of Medicine (Einstein) ensures objectivity, balance, transparency, and scientific rigor in all academic activities. All faculty are required to disclose any financial interests or other relationships relevant to their research or teaching that may create (or create the appearance of) a conflict of interest, and to help resolve such conflicts.

The intent of disclosure is not to prevent any individual with significant financial interests or other commercial relationships from being involved in research, teaching, or other academic activities, but rather to assure appropriate mitigation of potential conflicts of interest. The individual signing the attached form accepts the following definitions and requirements of Einstein.

1. **Disclosure**: Individuals appointed to the faculty of Einstein must submit or update a disclosure statement identifying all Significant Financial Interests (SFI) of themselves and/or related persons pertinent to their Institutional Responsibilities:
   - At time of appointment and annually thereafter;
   - Upon submission of a grant proposal and/or protocol for human subjects research;
   - In relation to a teaching assignment.

   The statement must be complete, accurate, and truthful to the best of the individual’s knowledge. Should an individual’s situation change, they should update their disclosure statement.

2. **Definitions**: Einstein employs definitions as promulgated by DHHS (Fed. Reg. 76:53256ff 8/25/2011)
   - **SFI**: $5,000 for services in prior 12 months or equity interest: includes any equity interest in a non-public entity.
     - Includes reimbursements for sponsored travel.
     - Excludes teaching or service on behalf of federal, state or local government, institutions of higher education, academic teaching hospitals, medical centers, and affiliated research institutes.
     - Excludes investment vehicles in which the individual does not directly control investment decisions.
   - **Related Persons**: Spouse or domestic partner, and dependent children
   - **Institutional responsibilities**: Academic activities (research and teaching) and administrative responsibilities on behalf of Einstein.
   - **Fair balance**: Faculty should prepare fair and balanced teaching presentations; these should be objective, evidence-based, and scientifically rigorous.
   - **Content validation**: Faculty should deliver content that is evidence-based and conforms to generally accepted formats of scientific information presentation. Any recommendations for evaluation or treatment should include discussion of the risks as well as the benefits.
   - **Unlabeled, unapproved and experimental uses**: Faculty must make clear in teaching presentations when they are discussing unlabeled, unapproved or experimental uses of drug products and/or devices.
   - **Generic vs. trade names**: Faculty preferentially should use scientific or generic names in referring to products. Discussion of proprietary products must include both the benefits and the limitations or risks of that product and appropriate reference to other products of the same class or type. There should be no preference of one product over another without a scientific, evidence-based justification.

3. **Commercial support or influence**: Faculty must disclose commercial support received and used for any research or in the preparation of an educational presentation. Individuals employed by the Albert Einstein College of Medicine may not participate in commercial speaker’s bureaus.

See Einstein Comprehensive COI Policy for additional information: New Comprehensive COI Policy 11 17 11.doc

(12/27/2011)
Conflict of Interest: Disclosure Statement

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Name: ____________________________  Department: ____________________________

With respect to the following:

Research protocol ____________________________ Course(s) or clerkship(s) ____________________________

➢ I (or a related person) have no significant financial interest or other relationship to disclose. ___
➢ I (or a related person) have the following significant financial interest(s) or other relationships to disclose: (indicate all that apply and explain below):

<table>
<thead>
<tr>
<th>Performance of work for any commercial entity that has a product or class of products that may be related to my institutional responsibilities*</th>
<th>Consultant/ Advisor</th>
<th>Employee</th>
<th>Contractor</th>
<th>Officer/ Director</th>
<th>Fiduciary role</th>
<th>Research Support</th>
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<th>Compensated service for any commercial entity related to my institutional responsibilities *</th>
<th>Consulting fees</th>
<th>Honoraria</th>
<th>Salary or Directors fees</th>
<th>Gifts/ Gratuities</th>
<th>Advisory Board Fees</th>
<th>Royalties</th>
<th>Sponsored travel</th>
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<th>Ownership interest, stock, or stock options in any entity related to my institutional responsibilities. *</th>
<th>Ownership interest</th>
<th>Stocks</th>
<th>Stock Options</th>
<th>Intellectual property (patent)</th>
<th>Other forms of Ownership</th>
<th>Publicly traded (P) or not (NP)</th>
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*List only proprietary entities (commercial interests) or not-for-profit organizations.

Explain briefly how this SFI or relationship pertains to your research, teaching or admin. responsibility (type or print):

Unlabeled/unapproved/experimental/investigational uses:
In teaching activities I intend to discuss Unlabeled/unapproved/experimental/investigational uses of the following:
1.                                                                                      
2.                                                                                      
3.                                                                                      

Signature: ___________________________________________  Date: ____________________________

Return completed form to: Office of COI 1003 Belfer.  FAX 718-430-8817.  coi@einstein.yu.edu

(12/27/2011)