

## Conflict of Interest Disclosure Form

**On-campus users:** <https://eph.aecom.yu.edu:8080/COIFront>\*

**Off-Campus users:** contact [COI@einstein.yu.edu](mailto:COI@einstein.yu.edu) for remote access\*

*\*Access requires a YUAD username and password. Please contact [COI@einstein.yu.edu](mailto:COI@einstein.yu.edu) for instructions on how to acquire your YUAD. Replies from the COI e-mail account occur during business hours only.*

### Information Pertaining to Conflict of Interest Disclosure

**Disclosure:** Individuals employed by Einstein or appointed to the Einstein faculty must disclose all **Financial Interests (FI)** and **Relationships with External Entities** at the time of appointment or hiring and at least annually thereafter (See below for exclusions)

- Einstein requires disclosure of **Financial Interests (FI)** of any value. **FI** include salary or any remuneration for services
- Disclosure also must include **Significant Financial Interests (SFI)** (see below for definition) of a **Related Party** (spouse, domestic partner, or dependent child).
- Disclosure must be complete, timely and truthful.

### Timeliness:

- An updated disclosure must be submitted **within thirty (30) days** of acquiring new **FI** or **External Relationship**.
- A COI disclosure on file must be updated if it is more than six (6) months old at the time of review in response to an "Event."

### Events Requiring Disclosure Review:

- Acquisition of new **FI** or **External Relationship**;
- Submission of a grant proposal (once notice of award has been received and before expenditure of any grant funds);
- Submission of a human subjects research proposal;
- Submission of an animal research protocol;
- Filing for a patent or clinical trial agreement.

**External Relationships Requiring Disclosure:** Any leadership, decision-making, officer or other fiduciary role, in a corporate entity or organization external to Einstein.

### 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.

## FI and SFI Exclusions Include:

- Income from investment vehicles (mutual funds/retirement accounts) as long as the individual does not directly control investment decisions made in these vehicles;
- Income from seminars, lectures, or teaching engagements sponsored by federal, state, or local government agency, an institution of higher education, an academic teaching hospital, a medical center, or a research institute that is affiliated with an institution of higher education; or
- Income from service on advisory committees or review panels for a federal, state or local government agency, institution of higher education, an academic teaching hospital, a medical center, or a research institute that is affiliated with an institution of higher education.

**Travel:** Individuals also must disclose **within thirty (30) days** the occurrence of any travel related to their institutional responsibilities that is reimbursed or sponsored (*i.e.* paid on behalf of the individual and not reimbursed so that the exact monetary value may not be readily available) by a not-excluded entity.

See Einstein Comprehensive COI Policy for additional information: [New Comprehensive Conflict of Interest Policy](#)

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