Conflict of Interest Disclosure Form

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

Off-Campus users: contact COI@einstein.yu.edu for remote access*

*Access requires a YUAD username and password. Please contact 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

All individuals employed by Einstein, whose grants are awarded to Einstein, or who are appointed to the Einstein faculty (and who are on the payroll of other institutions) must disclose Significant Financial Interests (SFI) or relationships with certain external entities at the time of appointment or hiring, and at least annually thereafter. IF, HOWEVER, there is any ‘event’ pertinent to an individual’s institutional responsibility, the disclosure MUST BE UPDATED WITHIN 30 DAYS of such ‘event’. An event which requires disclosure within 30 days includes:

- Acquisition of a new Significant Financial Interest (SFI);
- New relationship to any entity that is not excluded;
- Travel reimbursed or compensated by a non-excluded entity.

Key Elements of Disclosure:

- Disclosure must include SFI of a Related Party (spouse, domestic partner, or dependent child).
- Disclosure must be complete, timely, and truthful.
- The Disclosure Form can be accessed from on-campus (Einstein or Montefiore) or off-campus computers.

Definitions

Please be familiar with the following before initiating or updating your conflict of Interest disclosure. You should also gather relevant financial documents you may need to complete the form:

Events Requiring Disclosure Confirmation: You will be requested to confirm your SFI status with submission of a grant proposal (as part of “just-in-time” responses); submission of a human-subjects research protocol; submission of an animal research protocol; participation as a faculty member in medical school or graduate division course, or clinical clerkship; patent or clinical trial agreement.

Institutional Responsibility: Institutional responsibilities include research, teaching, clinical practice, and institutional administration. Any SFI or relationships with external entities related to these responsibilities must be disclosed.

Roles Requiring Disclosure: A leadership, consultative, decision-making, or other fiduciary role in a corporate entity of organization external to Einstein.

Significant Financial Interest (SFI):

- 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-publicly traded entity, SFI exists if the value of any remuneration (salary or payment for services) in the twelve months preceding the disclosure, when aggregated, exceeds $5,000, or when the Investigator or related party holds ANY equity interest.
- Intellectual property (IP) 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.
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.

Timeliness: Individuals must submit an updated disclosure **within thirty (30) days** of acquiring a new SFI.

Travel: Individuals must also 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 not-excluded entity. Excluded entities include federal, state, and local government agencies, institutions of higher education, academic teaching hospitals and medical centers, and research institutes that are affiliated with an institution of higher education.

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

**Conflict of Interest Disclosure Form**

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(8/15/2012)