



PATIENT-CENTERED OUTCOMES RESEARCH INSTITUTE

Supplemental Conflict of Interest Policy for PCORI Staff

Drafted February 19, 2013

Approved by the Board of Governors March 12, 2013

Strict conflict-of-interest rules are essential in order to protect the integrity of PCORI and the trustworthiness of its research. The primary purpose of this Supplemental Conflict of Interest Policy for PCORI staff is to identify the need for employee divestiture of direct financial relationships in the health or healthcare sectors (other than mutual funds) as a requirement and to further require full disclosure of all professional and financial relationships for the staff member and his/her close relatives both at the time of consideration as a candidate and no less frequently than once a year. These additional provisions supplement the current PCORI Conflict of Interest Policy approved by the Board on May 17, 2011.

Supplemental Conflict of Interest Policy for PCORI Staff

- **No financial interest and divestiture:** It has been determined that no PCORI employee can receive a direct financial benefit from a health or healthcare related organization during the course of his or her employment with PCORI. A financial benefit includes employment, honoraria, consulting fees, intellectual property royalties, stock ownership or other financial benefit. (Ownership of a mutual fund that owns healthcare-related companies is excluded.)
- **Transition for staff hired before adoption of the policy:** Staff hired before March 30, 2013, and who have direct financial benefits from the health or healthcare sectors, are required to propose a divestiture plan within two months of adoption of this policy. Investments should be divested within one year of adoption of this policy. If this presents a hardship, staff members should work with the Executive Director or his designee in order to seek approval for an alternate divestiture plan.
- **Disclosure of personal associations:** Each individual who is employed by PCORI is required to disclose any personal association with the potential to bias or has the appearance of biasing one's decisions relating to PCORI. Such disclosures must be made no less frequently than annually and at any time during the year when new potential conflicts may arise. With approval from the Executive Director, PCORI employees may have personal associations with health and healthcare-related organizations by serving as non-paid members, officers or directors of such organizations. However, PCORI reserves

the right to require an employee to sever associations with any organization which could create the appearance of a potential conflict of interest.

- **Disclosure of Close Relatives¹, financial interests and personal associations.** All financial, business or personal associations of close relatives of PCORI staff that could bias or have the appearance of biasing an employees' decisions relating to PCORI must be disclosed to the best of your knowledge. PCORI reserves the right to require divestiture of financial associations by close relatives if feasible. Where divestiture is not feasible, full disclosure is required.
- **Disclosure of Close Relatives' Employment.** Employment of close relatives in the health or healthcare sector should be disclosed at the time of application for employment and updated at least annually to the best of your knowledge. In some cases, certain positions at PCORI could be incompatible with the employment of close relatives in a health or healthcare related organization. In other cases, firewalls must be observed. Of most concern will be the employment of an employee's spouse/domestic partner.
- **Prohibition on Certain Close Relatives Applying for PCORI Research Funding.** As set forth in the PCORI Conflict of Interest Policy for Research Funding (adopted as of June 19, 2012), certain close relatives (spouse, domestic partner, children) of PCORI staff are ineligible to compete for PCORI research funding.
- **Conflict Adjudication.** Realizing that determination of direct financial benefit may be difficult to ascertain in some situations, the PCORI Standing Committee on Conflict of Interest (SCCOI) and its legal counsel will serve as an adjudicating body for employees or potential employees who question the status of certain financial holdings, income or relationships. Decisions by the SCCOI in this regard will be final.

The provisions of this Supplemental Conflict of Interest Policy for PCORI staff will be implemented at the direction of the Executive Director. Implementation will include: notice posted on PCORI's employment site; discussion before hiring; complete disclosure forms during onboarding, and updated annual disclosure forms.

¹ "Close relatives" include: spouse, [domestic partner], parent (including in-laws), child or sibling, as defined in the Conflict of Interest Policy approved by the Board of Governors on May 17, 2011.