



TO: Prospective Employees of PCORI
FROM: PCORI Director, Human Resources
RE: Conflict of Interest Policies and Expectations for PCORI Employees

Background

In accordance with PCORI's authorizing law and good governance, PCORI places a high value on transparency, credibility, and public engagement in our work. Therefore, strict conflict of interest rules are essential to PCORI in order to protect its integrity and the trustworthiness of its funded research and other projects and initiatives.

Consistent with these principles, the PCORI Board of Governors has adopted several conflict of interest policies (including a [Conflict of Interest Policy](#), a [Supplemental Conflict of Interest Policy for PCORI Staff](#), and [Conflict of Interest Rules for Research Funding](#)). Prospective PCORI employees are encouraged to review PCORI's conflict of interest policies as part of their application for PCORI employment. PCORI wants to ensure that all prospective PCORI employees are aware of PCORI's conflict of interest policies prior to accepting an offer of employment from PCORI. This memorandum highlights several requirements of the conflict of interest policies that are relevant to PCORI employees.

Required Disclosure of Financial and Business and Personal Associations of PCORI Employees and Close Relatives

PCORI requires all PCORI employees to disclose upon commencement of their employment and on an annual basis all financial and business and personal associations with the potential to bias or that have the appearance of biasing one's decisions relating to PCORI. Additionally, PCORI employees are required to disclose, to the best of their knowledge, all financial and business and personal associations of their close relatives that could bias or have the appearance of biasing the employee's decisions relating to PCORI. Close relatives for purposes of disclosure are defined as spouses, domestic partners, parents, in-laws, children, and siblings. All disclosures made by employees are made publicly available on PCORI's website.

Disclosures must include all financial and business and personal associations with any health or healthcare-related organizations and include all associations with any other organizations that have the potential to bias or that have the appearance of biasing one's decisions relating to PCORI, including but not limited to vendors or other third parties with whom PCORI has a contract or that PCORI has funded.

A financial and business association includes:

- a) employment, honoraria, and/or consulting or other fees for work performed ("Work Financial and Business Association") of the employee and close relatives;
- b) intellectual property royalties ("Royalty Financial and Business Association") of the employee and close relatives; and
- c) stock ownership or other investment interests or other financial benefits of the employee and



close relatives. Ownership of a mutual fund that owns healthcare-related companies is excluded (“Investment Financial and Business Association”).

A personal association includes:

- a) Health or healthcare-related organizations that the employee or close relative is a member of, serves on the Board of, volunteers for, or worked for within the past year; and
- b) Other personal associations with organizations that may benefit from PCORI decisions or activities.

Prohibition on Investment Financial and Business Associations with or Royalty Financial and Business Associations from Health or Healthcare Related Organizations for PCORI Employees

The Supplemental COI Policy for Staff prohibits PCORI employees from having an Investment Financial and Business Association with or a Royalty Financial and Business Association from a health or healthcare related organization during the course of the employee’s employment with PCORI. An Investment Financial and Business Association includes stock ownership or other investment interests or other financial benefits. However, ownership of a mutual fund that owns healthcare-related companies is permissible. Prospective employees that have an Investment Financial or Business Association or a Royalty Financial and Business Association from a health or health care related organization will be required to divest of such financial relationships to be a PCORI employee.

Prohibition on Employees and Close Relatives of PCORI Employees Applying for PCORI Research and Other Funding

Consistent with PCORI’s Conflict of Interest Rules for Research Funding, employees and close relatives of PCORI employees are excluded from competing for PCORI funding. Close relatives for purposes of the prohibition on applying for PCORI funding is defined as a spouse, domestic partner, and children.

Expectation of Complying with and Cooperating with Conflict of Interest Management

PCORI employees are required to cooperate with and implement conflict of interest management activities relating to any financial and business associations and relating to any personal associations as requested by PCORI. Conflict of interest management activities may include, but not be limited to, recusing from certain activities, maintaining firewalls relating to certain activities, and declining to participate in some activities. Financial and business associations and personal associations and any related conflict of interest management must not interfere with an employee’s performance or the ability to meet PCORI’s requirements.

Conclusion

PCORI wants to ensure that prospective employees are aware of its conflict of interest policies so that employment deliberations take into consideration this aspect of PCORI employment. Any prospective employee who has questions about how potential or existing associations would apply to PCORI’s conflict of interest policies should feel free to seek guidance from PCORI’s Human Resources Department.