



**TO:** Prospective Employees of PCORI

**FROM:** PCORI General Counsel  
PCORI Director, Human Resources

**RE:** Conflict of Interest Policies and Outside Employment Policy for PCORI Staff

### **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 research and research funding.

Consistent with these principles, the PCORI Board of Governors adopted a [Conflict of Interest Policy](#) for PCORI on May 17, 2011 and approved a [Supplemental Conflict of Interest Policy for PCORI Staff](#) on March 12, 2013. The PCORI Board of Governors also approved [Conflict of Interest Rules for Research Funding](#), as revised, on February 4, 2013.

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.

### **Prohibition on Direct Financial Benefit from Health or Healthcare Related Organizations for PCORI Employees**

The Supplemental COI Policy for Staff prohibits PCORI employees from receiving 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. However, ownership of a mutual fund that owns healthcare-related companies is permissible. Prospective employees that have a direct financial benefit from a health or health care related organization will be required to divest of such financial relationships to be a PCORI employee.

### **Required Disclosure of Personal and Financial 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 personal associations that “could bias or have the appearance of biasing an employee’s decisions relating to PCORI”. Additionally, PCORI employees are required to disclose, to the best of their knowledge, all personal and financial 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 is defined as spouses, domestic partners, parents, in-laws, children, and siblings. All disclosures made by employees are made publicly available on PCORI's website.

### **Prohibition on Close Relatives of PCORI Employees Applying for PCORI Research Funding**

Consistent with PCORI's Conflict of Interest Rules for Research Funding, close relatives of PCORI staff 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.

### **Outside Employment Policy**

While outside employment is allowable under certain circumstances, outside employment for PCORI employees that does not meet the PCORI base salary threshold or other requirements outlined in PCORI's Outside Employment Policy is prohibited. Outside employment for all PCORI employees that constitutes a conflict of interest, regardless of their PCORI base salary, is prohibited. Information on PCORI's Outside Employment Policy restrictions can be obtained from PCORI's Human Resources Department.

### **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.