



PATIENT-CENTERED OUTCOMES RESEARCH INSTITUTE

Supplemental Conflict of Interest Policy for PCORI Staff

Approved by the Board of Governors May 25, 2021

Appropriate conflict-of-interest disclosure and management are essential in order to protect the integrity of PCORI and the trustworthiness of its funded research and other funded projects. The primary purpose of this Supplemental Conflict of Interest Policy for PCORI Staff is to identify the need for employees:

- to disclose all financial and business associations and all professional associations of the staff member and the staff member's close relatives that could raise conflict of interest issues both at the time of hiring and no less frequently than once a year;
- to cooperate with and undertake conflict of interest management activities, such as recusals, firewalls, and avoiding certain activities, as requested by PCORI; and
- as appropriate, to divest of certain financial relationships in the health or healthcare sectors (other than mutual funds).

These additional provisions supplement other conflict of interest policies approved by the Board and other PCORI conflict of interest guidance.

- **Disclosure of Financial and Business Associations.** Each individual who is employed by PCORI is required to disclose all financial and business associations with the potential to bias or that have 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. Disclosures must include all financial and business associations with any health or healthcare-related organizations and shall include all financial and business 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 has funded. A financial and business association includes:
 - employment, honoraria, and/or consulting or other fees for work performed ("Work Financial and Business Association");
 - intellectual property royalties ("Royalty Financial and Business Association");
 - stock ownership or other investment interests or other financial benefits. Ownership of a mutual fund that owns healthcare-related companies is excluded. ("Investment Financial and Business Association").

- **Disclosure of Personal Associations.** Each individual who is employed by PCORI is required to disclose any personal associations with the potential to bias or that have 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. 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 personal associations with any organization which could create the appearance of a potential conflict of interest.
- **Cooperation with and Implementation of Appropriate Conflict of Interest Management Activities.** All PCORI employees must 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. Such 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.
- **No Investment Financial and Business Associations with or Royalty Financial and Business Associations from a Health or Healthcare Related Organization.** PCORI employees are prohibited from having any Investment Financial and Business Associations with or Royalty Financial and Business Associations from a Health or Healthcare Related Organization during the course of the employee's employment with PCORI.
- **Disclosure of Close Relatives' Financial and business associations and personal associations.** All financial and business associations and 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 the employee's knowledge. PCORI reserves the right to request divestiture of financial associations by close relatives if feasible.
- **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 or hiring and updated at least annually to the best of the employee's 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, conflict of interest management (e.g., firewalls and recusals) 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, certain close relatives (spouse, domestic partner, children) of PCORI staff are ineligible to compete for PCORI research funding.

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.

Approved by the Board of Governors on March 12, 2013

Amended and approved by the Board of Governors on May 25, 2021