Policy No: **107.17**
Revision No: **3**
Effective Date: 10/27/2004

**UNIVERSITY POLICIES & PROCEDURES**

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| Category: | Compliance Administration |
| Title: | **CONFLICT OF INTEREST POLICY: DISTRIBUTION TO NEW EMPLOYEES** |
| Applicability: | Thomas Jefferson University |
| Contributors/Contributing Departments: | |

## POLICY

In order to safeguard the tangible and intangible assets of the University, systems of internal review have been established to ensure that the University's objectives are not compromised by the actions of any employee or faculty member. In furtherance of these goals, the University has developed a Conflicts of Interest Policy for Employees (Policy No. 107.03) and Statement of Principles Regarding Avoidance of Conflicts of Interest for Employees of Thomas Jefferson University (Attachment 1 to Policy No. 107.03) (the "Statement").

In order to ensure understanding of the Policy and Statement, all newly covered individuals as defined in the Operating Definitions (Attachment 2 to Policy No. 107.03) will be provided with a copy of these documents. Such personnel also will be required to acknowledge their understanding of the Policy and Statement by submitting a Disclosure of Conflicts of Interest(Attachment 3 to Policy No. 107.03) (the "Disclosure"), thereby disclosing any potential conflicts of interest at the time of hiring or appointment. Thereafter, all covered individuals must complete and submit a Disclosure, disclosing any potential conflicts of interest, to the Conflicts of Interest Officer ("COI Officer") on an annual basis. Updated Disclosures must be submitted throughout the year if a change in financial circumstances arises that a covered individual believes under the policy may (a) give rise to a conflict of interest or (b) eliminate a previously disclosed conflict. The Statement and Disclosure also are available at the following web address:
http://www.jefferson.edu/universitycounsel/compliance_conflict.htm.

## PROCEDURE

On a monthly basis, the Department of Human Resources will provide to the COI Officer a list of all newly hired employees for TJU and Jefferson University Physicians. The COI Officer (or his/her delegate) then will distribute to all newly hired covered individuals copies of the following documents:

1) University's Conflicts of Interest Policy for Employees (Policy No. 107.03)

2) Statement of Principles Regarding Avoidance of Conflicts of Interest for Employees of Thomas Jefferson University (Attachment 1 to Policy No. 107.03)

3) Disclosure of Conflicts of Interest (Attachment 3 to Policy No. 107.03).

Individuals receiving the documents will be instructed to fill out the Disclosure form and return it to the COI Officer in the Office of University Counsel, 6th Floor Scott Building, within 15 days of receipt.

The Department of Human Resources also will notify the COI Officer whenever a new job code has been created and provide him/her with a detailed description of the newly created position. The COI Officer will review the job code description and determine whether individuals in that job code are "covered individuals" within the purview of the University's Conflicts of Interest Policy for Employees.

**Revision Date(s):**08/01/2000,06/07/2002,09/30/2003,10/27/2004
**Review Date(s):** 06/07/2002,10/27/2004

**Responsibility for maintenance of policy:** Office of University Counsel, Conflicts of Interest Officer

(Signature on File)

**Approved by:**

Joanne Rosenthal, Esq.
Acting University Counsel

(Signature on File)

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**Approved by:**
John P. Sullivan
Vice President for Administration