

Conflicts of Interest Program

Frequently Asked Questions

What is a Conflict of Interest (COI) or Conflict of Commitment?

A *Conflict of Interest* exists when a person is in a position to receive a personal benefit, for themselves or their family members, from an action or decisions made while acting in their official position as a member of the Jefferson community. Personal benefits may relate to salary, investments, stock ownership, royalties received, or other non-Jefferson activities.

A *Conflict of Commitment* occurs when a person dedicates time to personal activities in excess of the time permitted by policy, or any other external activities that may detract from their primary Jefferson responsibilities.

Why does Jefferson care about my personal relationships and financial interests?

Actual or perceived conflicts of interest can impact Jefferson's reputation and relationships. As outlined in our [Code of Conduct](#), we must avoid conduct that may lead the public to conclude that a member of Jefferson's community is using an official position to further personal or private business interests or the interests of family members. Jefferson policies mandate disclosure requirements to enable review for conflict of interest and professional commitment. The goal is to evaluate relationships and interests that might overlap with Jefferson institutional responsibilities such as research, purchasing, medical decision-making, or teaching.

Who is required to disclose? How will I know if I am required to participate?

All persons covered by Jefferson's Conflict of Interest and related policies must complete a COI disclosure at least annually. Jefferson personnel meeting certain criteria will be required to disclose, including members of the Board of Trustees, key employees, faculty, fiduciaries, staff and students involved in research, and providers. Read the policies for a complete list of criteria. Those required to participate in the annual disclosure process will receive an email inviting them to complete the questionnaire.

What do I need to disclose? Is there anything I shouldn't disclose?

You must disclose the outside activities, personal relationships, and financial interests that may relate to your Jefferson responsibilities. Examples of items that should be reported include:

- Business relationships with other Jefferson employees, Board of Trustee members, or companies to which Jefferson may have an interest
- Service on Advisory Committees, Boards, or Review Panels
- Gifts or contributions from a Jefferson vendor
- Financial interests from licenses, intellectual property, equity ownership, etc.
- Current and future research activity

Read the policies for a complete list of required disclosure elements.

Is there anything I shouldn't disclose?

You do **not** need to disclose your salary from Jefferson or your participation in local community activities (i.e. religious institutions, schools, and clubs), unless you conduct research that relates to the organization, or the organization has a relationship with Jefferson.

When do I disclose?

Required persons must complete a conflict of interest disclosure at least annually. You have a continuing obligation to disclose if your circumstances change between disclosure periods.

How do I disclose?

Jefferson uses a secure platform, [COI-Smart](#), to administer COI disclosures. If you are required to disclose, you will receive a personal invitation via email. You can also log in at any time with your campus key and password to review or update your disclosure.

Why am I receiving another COI disclosure? I filled out a disclosure during the medical staff credentialing process.

We recognize that you may be asked to participate in more than one disclosure processes in the same year. While we work to determine the extent to which consolidation of processes is feasible, we will maintain COI processes associated with the medical staff credentialing process and a general process associated with employment, research, and leadership roles.

What happens with the information I disclose?

Jefferson's team of Conflict of Interest experts engages in a confidential review process designed to identify relationships and activities that may require further analysis or action. Although certain public disclosures will occur in connection with Jefferson's IRS-related reporting responsibilities, efforts are made to keep information confidential.

What happens if Jefferson's Conflicts of Interest Committee determines that I have an actual or potential conflict?

When action is required with respect to identified conflicts, certain information will be disclosed to organizational decision makers to ensure that identified conflicts of interest are managed, reduced, or eliminated. The Committee will create a conflict management plan, which documents your role at Jefferson and the nature of the identified conflict. The plan outlines the terms for managing issues going forward that you would need to follow. Management plans are common and required by regulators and sponsors.

The Office of Enterprise Corporate Compliance is here to help!

Please refer additional questions regarding Jefferson's Conflicts of Interest Program to Kim Grazionale, COI Administrator, at 215-955-9052 or JEFFCOISmart@jefferson.edu.