

# The Rockefeller University Policy on Financial Conflict of Interest in Research

## Introduction

The objective of this Policy is to maintain the integrity and transparency of financial relationships as they may relate to Investigators' research at The Rockefeller University ("University"). To accomplish our purpose, all Investigators (defined below) must complete an annual certification ("Annual Certification") of their Significant Financial Interest ("SFI", defined below) disclosures.<sup>1</sup>

This Policy is consistent with the financial conflict of interest regulation promulgated by the Department of Health and Human Services ("DHHS"), as revised in 2011 ("Regulation"), and applies to all research funded by federal Public Health Service ("PHS") agencies as well as sponsors that follow the Regulation.<sup>2</sup>

Recipients of research funds from sources other than PHS and sponsors that follow the Regulation must comply with the conflict of interest requirements of the funding source.<sup>3</sup>

Irrespective of funding source, Investigators must disclose all of their SFI. These SFI disclosures enable the University to initiate its conflict of interest review, as needed.

Investigators who are responsible for the design, conduct, or reporting of research are required to complete a certification of their SFI disclosures ("Certification") prior to submitting a PHS grant application. Investigators are required to complete a research certification to update their SFI disclosures in connection with newly awarded research projects ("Research Certification"). Investigators also must update their SFI disclosures within thirty (30) days of disc

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<sup>1</sup> During the University's annual disclosure cycle, each Investigator will be notified by email to complete an Annual Certification. The email notification will contain a link to the Investigator's Annual Certification workspace in the University's Research Administration System ("RAS"). Investigators also may log into RAS at any time to complete or update SFI disclosures at: <https://RAS.rockefeller.edu>

<sup>2</sup> References in this Policy to "PHS-funded research" or "PHS awarding agency" include research funded by sponsors that follow the Regulation.

<sup>3</sup> Please note that National Science Foundation has different financial conflict of interest



the value of any equity interest in the organization as of the date of disclosure, when aggregated, that exceed \$5,000, must be disclosed; (ii) With regard to a *non-publicly* traded external organization, any payment or remuneration received in the 12 months prior to the date of disclosure that exceeds \$5,000, and/or any equity interest, regardless of value, must be disclosed.

**Intellectual Property Rights and Interests** (e.g., patents, copyrights), upon receipt of income related to such rights and interests.

Monetary Threshold for Disclosure for **Intellectual Property Rights and Interests**: Income from such intellectual property rights and interests that exceed \$5,000, received from an external organization in the 12 months prior to the date of disclosure, must be disclosed.

**Reimbursed or Sponsored Travel** paid by an external organization.

**Sponsored travel** includes travel that is paid on b



design, conduct, or reporting of the research an fCOI may be found to exist.

If the Committee determines that the Investigator has an fCOI, the Committee will work with the Investigator on a management plan to eliminate, reduce, or manage the conflict. Management plan elements may include, but are not limited to, requiring the Investigator to disclose the potential fCOI to laboratory or study team members working on the research, to research participants, and/or to publishing journals; establishing independent review of research data; and/or requiring the Investigator to relinquish the SFI. The University will monitor the Investigator's compliance with each imposed management plan on an ongoing basis until completion of the PHS-funded research project.

To the extent that a new or previously unreported SFI is disclosed during the course of PHS-funded research (*e.g.*, an Investigator who is new to the research project discloses SFI or a previously named Investigator discloses new or previously unreported SFI), the Committee will, within 60 days from the date of the disclosure, determine whether an fCOI exists, and, if so, will implement a plan to eliminate, reduce, or manage the conflict.

If an fCOI is not identified or managed as required, due to (i) a failure by an Investigator to timely disclose SFI that is later determined by the Committee to constitute an fCOI,

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## **Reporting Financial Conflict of Interests**

Prior to the University's expenditure of awarded funds, the University is required to report to the PHS awarding agency the existence of any fCOI, including fCOI of sub-recipient Investigator's management plan(s) and to submit an fCOI report to the awarding agency. The University also must submit annual fCOI reports to the PHS awarding agency during the award period. These annual reports must address the status of the fCOI, e.g., whether the fCOI is being managed, any changes to the management plan, and/or if the fCOI no longer exists. Annual reports must be made for the duration of the research project period (including extensions with or without funds) in the time and manner specified by the PHS awarding agency.

The University must also submit fCOI reports to the PHS awarding agency within sixty days of identifying any previously unreported fCOI.

Within five (5) business days of receiving a written request from the public for information about PHS-funded research involving an Investigator with an fCOI, the University will respond to the request in writing, providing the name of the Investigator, the external organization in which the Investigator holds SFI, the nature of the SFI, and the approximate value of the SFI, in dollar ranges, if known.

## **Final University Financial Conflict of Interest Authority**

If the Committee is unable to reach agreement with an Investigator on an appropriate plan to eliminate, reduce, or manage an fCOI, the Committee will provide the Investigator with a written impasse letter. Within two weeks of the date of the written impasse letter, the Investigator or the Committee will seek the intervention of the University President.

The President will address the conflict and render a decision on its resolution. The President's decision is final, except that it does not extend to the decisi

## **Noncompliance and Sanctions**

In the event an Investigator fails to comply with this Policy or a previously imposed fCOI management plan, the Committee shall recommend appropriate sanctions that may include, for example, imposing a stricter management plan, withholding a PHS grant application, suspending an ongoing PHS-funded research project, freezing PHS-funded research project funds, and/or other appropriate sanctions.

As amended by the Academic Council on April 17, 2012, effective August 24, 2012 and reported to the Board of Trustees on June 6, 2012, and as further amended by Academic Council on April 18, 2016, May 16, 2017, May 25, 2022, and May 24, 2023 (effective July 31, 2023), as amended by Administrative Working Group on August 8, 2023.