

Conflicts of Interest Program

Frequently Asked Questions

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

A **Conflict of Interest (COI)** exists when an individual can personally benefit—directly or indirectly, including through family members—from decisions made in their official role at Jefferson. Personal benefits may include salary, investments, stock ownership, royalties, or involvement in non-Jefferson activities.

A **Conflict of Commitment** occurs when personal activities exceed the time permitted by policy or interfere with primary responsibilities at Jefferson.

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

Actual or perceived conflicts of interest can impact Jefferson's reputation and integrity. As outlined in the [Code of Conduct](#), it is important to avoid situations where a Jefferson community member could be seen as using their role to further personal or business interests.

Jefferson policies require COI disclosures to assess relationships and interests that may overlap with institutional responsibilities such as research, purchasing decisions, medical decision-making, and teaching. The goal is to evaluate and manage potential conflicts to uphold ethical and transparent practices.

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

Anyone covered by Jefferson's COI policies must complete a disclosure at least annually. If you are required to participate, you will receive an email invitation with instructions on how to complete the questionnaire. For a full list of disclosure requirements, refer to Jefferson's COI policies.

What do I need to disclose?

You must disclose outside activities, financial interests, and personal relationships that may relate to your Jefferson responsibilities, including:

- Business relationships with Jefferson employees, Board of Trustees members, or companies Jefferson engages with
- Service on advisory committees, boards, or review panels
- Gifts or contributions received from a Jefferson vendor

- Financial interests from intellectual property, licenses, or equity ownership
- Current and future research activities

For a full list of required disclosures, review Jefferson's COI policies.

Is there anything I don't need to disclose?

You do not need to disclose your salary from Jefferson. Participation in local community activities (such as religious institutions, schools, and clubs) does not require disclosure unless the organization is involved in research related to Jefferson or has a financial relationship with Jefferson.

When do I need to disclose?

COI disclosures must be completed at least annually. If your circumstances change between reporting periods, you are required to update your disclosure as soon as possible.

How do I submit my disclosure?

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

Why am I being asked to complete another COI disclosure?

Some individuals may be required to complete multiple disclosures in the same year, such as during the medical staff credentialing process and through the general employment, research, or leadership COI process.

While Jefferson is assessing ways to streamline these processes, both disclosure requirements remain in place at this time.

What happens to the information I disclose?

Your disclosure is confidentially reviewed by Jefferson's COI experts to identify potential conflicts that may require further evaluation.

Certain public disclosures may be required for IRS reporting or regulatory compliance. However, efforts are made to keep information confidential within Jefferson's review process.

What if the Conflicts of Interest Committee determines I have a conflict?

If a potential conflict of interest is identified, the Conflicts of Interest Committee will assess the situation and take appropriate action.

A conflict management plan may be developed to outline how the issue will be handled. This plan will include specific guidelines for managing the conflict while allowing you to continue your role at Jefferson. Management plans are common and required by regulatory agencies and funding sponsors.

Who can I reach out to for additional information or assistance?

The Office of Enterprise Corporate Compliance is available to assist. For more information or assistance with your COI disclosure, contact us at 215-503-6300, or email JeffCOISmart@jefferson.edu.