

# Make sure you read like an open book.

Full disclosure of your personal relationships and financial interests is an important part of business and research integrity at Jefferson. Completing your annual Conflicts of Interest disclosure and updating it as soon as your circumstances change is vital to maintaining transparency.

Disclosure helps Jefferson comply with state and federal laws, while building trust in the care, education, and services we provide.

## Contact

Phone 215-503-6300

Web [Jefferson.edu/university/counsel/coi.html](http://Jefferson.edu/university/counsel/coi.html)

Mail [JeffCOISmart@Jefferson.edu](mailto:JeffCOISmart@Jefferson.edu)



SCAN THE QR CODE  
TO LEARN MORE



## Conflicts of Interest Program



Conflicts of Interest and Commitment Committee  
Office of Enterprise Corporate Compliance

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## ABOUT COI

### Jefferson's **Conflicts of Interest** Program

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 financial incentives, investments, stock ownership, royalties received, or other non-Jefferson activities.

#### COMMON TYPES OF CONFLICTS



**Personal Bias:** A patent you own, a role you hold in your community, or other personal connection that intersects with your Jefferson duties.



**Industry or Familial Relationship:** Your personal relationships, such as reporting lines that involve family members or personal contacts at associated organizations, that intersect with your Jefferson duties.



**Financial Interest:** Your investments with or compensation from organizations with Jefferson ties.

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## DISCLOSURE

### Reporting Relationships and Financial Interests



#### WHO DISCLOSES

All persons covered by Jefferson's Conflict of Interest and related policies must complete a disclosure, including providers, researchers, key employees, and more.



#### WHEN TO DISCLOSE

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



#### HOW TO DISCLOSE

Jefferson uses a secure platform, COI-Smart, to administer disclosures. You will receive an email when you are required to disclose, or log in any time to update.

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## MANAGING CONFLICTS

### Steps to **reduce, manage, or eliminate** identified conflicts

- Disclosures are initially reviewed for conflicts by COI staff. Potential conflicts are escalated to the COI Committee and Institutional COI Officer for further analysis.
- Identified conflicts must be reduced, managed, or eliminated by following a management plan established by the Committee or Institutional COI Officer.

Jefferson's COI Committee welcomes inquiries related to actual or potential conflicts of interest. If you are contemplating entering into a business or other relationship that may impact your work at Jefferson, please contact 215-503-6300.