

Financial Conflict of Interest in Research Policy

FREQUENTLY ASKED QUESTIONS

1. Who is covered by the Hartford HealthCare (HHC) Financial Conflict of Interest in Research policy?

Anyone responsible for the design, conduct, or reporting of research (internally and externally funded), regardless of title or position. These people are defined as Investigators under the HHC policy.

ALL Investigators must complete an annual Financial Interests in Research Disclose Form and complete conflict of interest training in accordance with the policy.

2. I am involved with research at HHC but I'm not a HHC employee. Am I required to complete a HHC Financial Interests in Research Disclose Form?

Yes, as long as you meet the definition of an Investigator.

If you are a sub-recipient Investigator (HHC receives a federal award and sub-awards a substantive portion of the research project to your institution), HHC's written agreement with the sub-recipient states whether the HHC Financial Conflict of Interest policy or that of the sub-recipient will apply to the sub-recipient's Investigators.

3. What do I have to do in order to comply with the policy?

At a minimum, you'll have to complete an annual Financial Interests in Research Disclose Form. You do not have to update the disclosure more than once a year unless you have any new or changes to your financial interests that result in a significant financial interest as defined by the policy.

4. What happens if my financial interests change during the period of the research award or after the annual disclosure?

You have an ongoing obligation to disclose significant financial interests throughout the year. You must update your disclosure form within thirty (30) days of a change in previously disclosed financial interests or the event resulting in a new significant financial interest.

5. What must be disclosed?

You must disclose significant financial interests that belong to you, your spouse and/or your dependent children that are related to your Institutional responsibilities – not just your research related activities. This includes:

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- Stock or other equity interest held in a publicly-traded entity in which you directly control the investment decisions
- Salary or payment from a publicly-traded entity
- Stock or other equity interest held in a non-publicly traded entity
- Salary or payment from a non-publicly traded entity
- Intellectual property rights and interest income that is paid to you by an entity other than HHC
- Reimbursed or sponsored travel (see **FAQ #8**)

Please refer to the HHC FCOI in Research Policy for the definition of significant financial interest and reportable dollar thresholds.

6. Do I need to disclose salary paid to me by HHC as an Investigator?

No. Salary, royalties, or other remuneration from HHC does not have to be disclosed if you are employed or appointed by HHC.

7. What are *Institutional responsibilities*?

Institutional responsibilities are your professional obligations carried out on behalf of HHC, involving your expertise. Examples include activities such as research, research consultation, teaching, professional practice (e.g., providing patient care, accounting services, legal counsel), participation in purchasing decisions, evaluating products or services on behalf of HHC, committee memberships, and service on panels such as an Institutional Review Board or Data and Safety Monitoring Board.

8. Do I need to disclose all reimbursed or sponsored travel?

Yes. This includes any reimbursed or sponsored travel which is paid on behalf of the Investigator and not reimbursed to the Investigator so that the exact monetary value may not be readily available. However, disclosure does not apply to travel that is reimbursed or sponsored by the following types of organizations:

- a federal, state or local government agency
- an outside institution of higher education
- an outside academic teaching hospital
- an outside medical center
- a research institute that is affiliated with an institution of higher education

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Finally, travel that is required as a part of a research project, such as to attend an Investigators' meeting or training is not required to be disclosed.

9. Do I have to disclose stock holdings such as my retirement account or my mutual funds?

No. You don't have to disclose your investments, such as retirement accounts or mutual funds, as long as you do not directly control the investment decisions.

10. I am involved in a research project that receives sub-recipient funding (for example, funding from the National Institutes of Health (NIH) to a university, then to HHC). Does this policy apply to me?

Yes, you meet the definition of an Investigator and are required to complete a Financial Interests in Research Disclose Form in accordance with HHC policy regardless of the funding source.

11. If I do disclose a significant financial interest, what happens then?

Your disclosure form will initially be reviewed by the Research Compliance Manager and referred to the Research Conflict of Interest Committee for evaluation. The Committee will determine if a conflict of interest exists and, if needed, recommend a management plan to mitigate or manage the conflict so that you can conduct your research as planned.