

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

## Introduction

The objective of this Policy is to maintain integrity and transparency of financial relationships as they may relate to Investigators' human participant 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 applies to all human participant research conducted at the University. Irrespective of funding source, Investigators must disclose all of their SFIs. 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 involving human participants are required to complete a certification of their SFI disclosures ("**Certification**") prior to submitting a protocol for review by the University's Institutional Review Board ("**IRB**"). Investigators are required to complete a research certification to update their SFI disclosures ("**Research Certification**") in connection with new research protocols on which they are Key Study Personnel ("**KSP**") (defined below). Investigators also must update their SFI disclosures within thirty (30) days of acquiring or discovering any new SFI. The University's Faculty Conflict of Interest Committee ("**Committee**") determines whether the disclosed SFI is related to the

---

<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>.

## **Definitions**

### **Investigator**

Investigator means any KSP regardless of title or position (e.g., collaborators, consultants), who is named on a study protocol involving human participants.

### **Certification**

Certification means an Annual Certification or a Research Certification.

### **Key Study Personnel (KSP)**

All persons who are responsible for the design, conduct, or reporting for the study.

### **Financial conflict of interest (fCOI)**

A financial conflict of interest exists when an Investigator's SFI could directly and significantly affect the design, conduct, or reporting of the Investigator's research.

### **External Organization**

An external organization means any domestic or foreign (i.e., n



### **Faculty Conflict of Interest Committee (Committee)**

The Committee, composed of members of the University faculty, has the authority to determine whether an Investigator's SFI creates an fCOI. If so, the Committee works with the Investigator to eliminate, reduce, or manage the conflict by implementing a management plan.

### **Procedures for Financial Disclosure and For Addressing Conflict**

Each Investigator must update his or her SFI disclosures:

- at least annually, by completing an Annual Certification;
- within 30 days of acquiring a new SFI, including reportable travel;
- within 30 days of discovering a previously unreported SFI; and
- prior to submission of a protocol to the IRB, or when an Investigator is added to an ongoing protocol as KSP, by completing a Research Certification.

The Committee will review each certification to determine whether a reported SFI disclosure reasonably appears to be related to the Investigator

to Academic Council on January 25, 2019, as amended by Administrative Working Group on August 8, 2023.