

## Partners Conflict of Interest Disclosure Process Summary of What You Need to Disclose

You will be asked four questions about your relationships with “Outside Entities.”

### What is an Outside Entity?

- Any corporation, foundation, or other organization that is NOT a Partners entity, including a governmental entity; and
- It provides, has provided, or is likely to provide goods or services to Partners - remember that potential vendors span a wide range of industries, not all healthcare-related; or
- It is involved in providing healthcare-related goods or services.

### QUESTION 1: What were your Outside Activities in Calendar Year (CY) 2009?

- Include work you performed in CY 2009 for an Outside Entity that called upon your job experience and training, but was outside your institutional responsibilities.
  - Include both for-profit and non-profit organizations.
  - Could have been paid or unpaid.
- Examples of Outside Activities: working as a consultant; serving on a Board of Directors; acting as an expert witness; talks and lectures paid by pharmaceutical and drug companies or any Partners vendor or medical education company.
- What types of speaking engagements need to be disclosed?
  - You do **NOT** need to disclose the following:
    - Talks for which formal CME or equivalent credit was given by an ACCME-accredited CME provider and/or an equivalent national accredited provider.
    - Talks hosted by, and for which you were paid by, academic institutions, professional societies, or governmental entities/agencies, regardless of whether CME credit was given.
  - All other **paid** talks or lectures must be disclosed. This includes:
    - Talks where you were paid directly by a pharmaceutical or medical device company or any Partners vendor.
    - Talks where you were paid directly by a medical education company (MEC), where formal CME credit was not given to attendees. If you know that such a MEC hosted talk was funded by another company, such as a pharmaceutical or medical device company, you will also need to disclose information about the funding company.

### QUESTION 2: What were your Equity Interests?

- Include all of the stocks, stock options, and ownership interests in Outside Entities that you had on 12/31/09, no matter how small the value, even if you held just one share, one option, or a fraction of an ownership interest, so long as those Outside Entities meet the definition of Outside Entity listed at the top of this page.
- Include all holdings in your possession on 12/31/09, where you had the right to control the investment of funds, regardless of whether you exercised that right.
- Do not report holdings in mutual funds, pension funds, 401(k)/ 403(b) funds.

### QUESTION 3: What were your Family Associations & Equity Interests?

- “Family” is anyone in your immediate family (parents, spouse, siblings, and children) and anyone else who is a member of your household.
- You **ONLY** have to report Family Associations and Equity of which you are already aware – no need to hunt down information.
- “Family Associations” are paid or unpaid relationships that your family members had in CY 2009 with Outside Entities, whether the organizations were for-profit or non-profit.
- “Family Equity Interests” consist of stock, options or ownership that your family members had on 12/31/09 in Outside Entities – and you must report all family equity interests, no matter how small in value (but again, only those of which you are already aware ).

### Question 4: What payments did you receive for Intellectual Property?

- You must report royalties, milestones or other payments you received for:
  - (1) Patents; (2) Copyrights (3) Other tangible materials such as cell lines, reagents, etc.
- You must report the name of the outside company from which the payments originate, even if you receive that payment through a Partners institution.

### Where to go for help

- **Your Departmental COI Delegate**  
[http://phsresearchintranet.partners.org/Conflict\\_of\\_Interest/SuperDelegates.asp?subID=leftnav2](http://phsresearchintranet.partners.org/Conflict_of_Interest/SuperDelegates.asp?subID=leftnav2)
- **Your Entity Compliance Officer** <http://pulse.partners.org/OII/complianceofficers.html>
- **The Partners COI Administrator:** [COIAdmin@partners.org](mailto:COIAdmin@partners.org)