

<b>Policy Title: Conflict of Interest Disclosures for Residents and Fellows</b>
Policy Owner: Office of Compliance
Origination Date: March 25, 2024
Last approved: March 25, 2024 Adopted by GMEC: April 19, 2024

## SCOPE:

This policy was developed for SIU Medicine (SIU). SIU Medicine collectively applies to the SIU School of Medicine (SIU SOM), including the Federally Qualified Health Center (FQHC), and SIU HealthCare (SIU HC). These entities are collectively referred to as SIU in this policy.

This policy applies to SIU residents and fellows who are employed by partner hospitals.

## PURPOSE:

SIU is committed to protecting the integrity of research, education and medicine, providing quality care to patients, and ensuring compliance with laws related to conflicts of interests and relationships with external entities. The purpose of this policy is to promote ethical conduct in clinical care, research, leadership, education and professional duties at SIU.

## POLICY:

Relationships with external entities can be beneficial to SIU and the patients it serves. SIU residents and fellows are expected to conduct SIU business free of personal conflict of interest or appearances of impropriety and self-dealing.

Residents and fellows employed by partners hospitals should follow this policy and the policy of their employing hospital when applicable.

## DEFINITIONS:

**Conflict of commitment:** occurs when SIU resident or fellow engages in activities with external entities, either paid or unpaid, that could interfere with their professional obligations to SIU.

**Conflict of interest:** occurs when a SIU resident or fellow's financial, professional, commercial, or personal interests or activities outside of the University affects or could appear to affect their professional judgment or obligations to SIU.

**Consulting:** means performing work or providing expert advice or opinions for a fee. Consulting work often involves a consulting contract. Within the context of this policy, consulting specifically excludes: giving invited talks to other academic institutions or government agencies; manuscript reviews; service on committees for professional organizations; and visiting professorships at other academic institutions. For any questions as to whether an engagement with an external entity is considered consulting, contact the Office of Compliance.

**External entity:** any company, entity, or government agency outside of SIU.

**Foreign:** means located outside of the United States

**Immediate family member:** includes the individual's spouse, domestic partner, parents and children.

**Personal capacity:** means something (1) done on the individual's own personal time, either outside of work hours or on benefit time; (2) any financial compensation for the activity is paid to the individual directly; and (3) the individual has not been asked to represent SIU and is not speaking on behalf of or expressing opinions of SIU.

## **PROCEDURES:**

SIU residents and fellows are expected to obtain approval from their Program Director and when required by hospital policy, from their employing hospital prior to engaging in any outside activities covered under this policy. The approval from the Program Director and/or employing hospital should be sought prior to seeking any required approval from the Office of Compliance and Ethics or disclosing any outside activity on COI disclosures.

SIU residents and fellows who engage in paid consulting or other paid external professional relationships in a personal capacity may not use SIU resources to complete the engagement. This includes SIU time. All residents and fellows who engage in paid consulting or other paid external professional relationships in a personal capacity must do so on their own time.

The Illinois Ethics Act Gift Ban does not apply to SIU residents and fellows employed by partner hospitals.

## **Conflict of Interest Disclosure Requirements**

Residents or fellows employed by a partner hospital do not need to complete a SIU conflict of interest disclosure unless:

- 1) They are participating in research activities at SIU. This disclosure is required if the resident or fellow is engaged in the conduct of research at SIU as defined by federal guidance and SIU policies; or
- 2) They own, or have partial ownership of, a company or intellectual property that is related to healthcare or the delivery of healthcare services.

All disclosure obligations include relationships that the resident or fellow has as well as relationships with external entities that are held by the individual's immediate family members.

Disclosures should be updated within thirty (30) days of acquiring or establishing a new relationship or financial interest that requires disclosure.

Residents and fellows are strongly encouraged to disclose anything that may raise a potential conflict of interest and seek guidance from the Office of Compliance and Ethics.

## **Review and Management of Disclosures**

All disclosures of external relationships will be reviewed by the Office of Compliance and Ethics staff. The Office of Compliance and Ethics proactively manages all disclosures, whether or not it creates an actual conflict at the time of the disclosure. If an external relationship is deemed to be a potential, perceived or actual conflict of interest that requires a management plan, the Office of Compliance and



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Ethics will utilize internal guidelines to draft the terms of the management plan. The plan will then be sent to the individual with the external relationship for agreement. Once the terms of the management plan are agreed to, the plan will be finalized and signed by the individual and the Program Director. Nothing in this policy shall prohibit the Office of Compliance and Ethics from requesting additional information which is necessary to the review and assessment of any conflict of interest or to the establishment of an appropriate management plan.

It is the individual's responsibility to ensure the terms of the management plan are followed. The Office of Compliance and Ethics will periodically monitor compliance with management plans.

### **Conflict of Commitment**

If at any time it is determined by the Program Director that outside activities are interfering with the resident or fellow's work at SIU, the Program Director may withdraw approval for the resident or fellow to engage in the outside activity.

### **PERIODIC REVIEW OF POLICIES AND PROCEDURES**

SIU shall review its policy and procedure for Conflict of Interest for Residents and Fellows at least once every two (2) years.

### **OFFICE OF RESPONSIBILITY**

The Office of Compliance and Ethics