



WOODS HOLE OCEANOGRAPHIC INSTITUTION

CONFLICT OF INTEREST AND CONFLICT OF COMMITMENT

POLICY INFORMATION

Responsible Member of the Directorate: Deputy Director and Vice President for Research; Vice President for Business and Legal Affairs, General Counsel

Responsible Office: Deputy Director and Vice President for Research; Vice President for Business and Legal Affairs, General Counsel

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DEFINITIONS

These definitions apply to these terms as they are used in this policy.

Advisory Committee on Ethics,
Conflicts, and Security (ACECS)

WHOI's Advisory Committee on Ethics, Conflicts, and Security (ACECS) promotes the principles of ethical research, the protection of national security interests, and their impact on WHOI's mission and successful operation. As such, ACECS provides guidance to the WHOI community in the assessment and oversight of research ethics, conflicts of interest or commitment, intellectual property, and security in research and development projects at WHOI.

Conflict of Commitment
(COC)

Situations where an Individual's outside activities, however valuable in themselves, interfere or appear to interfere with their obligations to the Institution, colleagues, and students, and/or WHOI's mission.

Conflict of Interest (COI)

Situations where an Individual or Close Relative might influence the Institution's business, research, or mission-related activities in ways that could lead to personal gain or give improper advantage to themselves or Close Relatives.

Conflict Management
Plan (CMP)

An affirmative plan necessary if deemed so by ACECS to mitigate disclosed conflict if the Individual does not eliminate the conflict.

Facility Use Agreement

Form to be submitted by an Individual that intends to use any WHOI facility, property or equipment for an external Organization or for the purposes of a Start-up company.

Financial Interest	<p>Anything of monetary value whether or not the value is readily ascertainable. These include serving as employee, consultant, contractor or board member; being entitled to receive income, equity interests (e.g., stock or stock options), royalties, or payments (e.g., salary, consulting fees, honoraria, paid authorship fees); having an investment or ownership interest in excess of \$5,000; intellectual property rights and interests (e.g., patents, copyrights, royalties) from a company valued in excess of \$5,000 when aggregated in the 12 months preceding the disclosure.</p> <p>Exemptions from Financial Interest include salaries, royalties, or other income paid by WHOI to the Individual if the Individual is currently employed or appointed by WHOI; Standard Honoraria; and income from investment vehicles, such as mutual funds and retirement accounts, as long as the Individual (or the Individual's Close Relative) does not directly control the investment decisions made in these vehicles are exempted from being Financial Interests.</p>
Individual	<p>All personnel at WHOI including the Scientific and Technical Staff, Trustees, Administrative Staff and all other employees, students (other than MIT-WHOI JP students), post-doctoral fellows/ investigators/ scholars, and anyone who has a WHOI appointment including visitors, guests, Emeriti, and adjuncts.</p>
Industry-Sponsored Research Investigator	<p>Research funded by an external industry Organization. The principal investigator (PI), co-principal investigator, or any other person, regardless of title or position, who is responsible for the design, conduct, or reporting of research or educational activities funded or proposed for funding.</p>
Managerial Role	<p>Role within an Organization that includes but is not limited to responsibilities of planning, organizing, leading, administrating, and controlling the organization as a whole or in part. The person in a Managerial Role often has supervisor duties and may have direct reports. Some such roles could be titled President, CEO, CTO, Department Chair, Center Director, Program Manager, Project Manager, Chief Research Officer, Lab Manager, etc.</p>

Organization	Any entity, or company, publicly or privately held, including Institution of Higher Learning or institute affiliated with Institutions of Higher Learning, Corporation, Federal, State or Local Government Agency, Foundation, non-profit or not-for-profit entities.
Standard Honorarium	Income from seminars, lectures, teaching engagements, service on advisory committees or review panels that are reimbursed or sponsored by an Organization not to exceed \$1,000. Acceptance of honoraria in excess of \$1,000 requires permission from the Deputy Director and Vice President for Research.
Start-up Company (Start-up)	A company, however organized, where the original intellectual property originates from within WHOI, and where one or more WHOI Individuals is/are a founder and has a Financial Interest in the company, and may have an influential role in determining the direction of the company.

CONFLICT OF INTEREST AND CONFLICT OF COMMITMENT POLICY

In order to promote and protect academic freedom, and the integrity and the mission of the Institution, this policy is implemented to provide transparency and to ensure the resolution of any real, potential, or apparent COI or COC. All Individuals have an obligation to avoid conflict, or the appearance of conflict, between their personal interests and the interests of WHOI and to avoid any situation that affects, or potentially could affect, his or her independent, unbiased judgment in the discharge of his or her duties. COIs and COCs can arise naturally from engagement with the world external to the Institution, and the mere existence of a COI or COC does not necessarily imply wrongdoing. However, both actual conflicts and the appearance of conflicts can be harmful to the Institution, its mission, and to the Individual involved.

Common sense and scientific integrity must prevail in the interpretation of these policies. If an independent observer might reasonably question whether the Individual's professional actions or decisions are determined by considerations of personal financial gain, the relationship should be disclosed to WHOI, as well as to any other parties, during presentations, in publications, in grant or contract proposal process, or other venues. Disclosure to WHOI does not eliminate the need for Individuals to also disclose to any other party, including the general public, any potential conflicts of interest in order to ensure transparency and scientific integrity. WHOI may be required, by law or by conditions imposed by a sponsor, to report a COI and also any failure to report a COI, to the affected project sponsors.

A. Conflict of Interest

WHOI is an institution of public trust; Individuals must respect that status and conduct their affairs in ways that will not compromise the integrity of the institution or that trust. A COI occurs when there is a divergence between an Individual's private interests and professional obligations to WHOI such that an independent observer might reasonably question whether the Individual's professional actions or decisions are determined by considerations of personal Financial Interest. Further, a COI may exist if an external Organization attempts to influence an Individual's or the Institution's work or direct WHOI resources. A COI depends on the situation, and not on the character or actions of the Individual. There are four major categories of conflicts:

1. Financial (e.g., employee or close relative ownership in entities involved with WHOI or affected by WHOI projects, hiring vendors or independent contractors that are Close Relatives).
2. Science (e.g., receiving industry funding/or doing consulting work with an external Organization related to an Individual's research, experience, training, role or responsibilities at WHOI).
3. Mission (e.g., funding from organizations in conflict with our mission).
4. Reputational (e.g., greenwashing, or conveying a false impression or providing misleading information about how a company's products/service are environmentally sound).

Individuals should conduct their affairs so as to avoid or minimize COI, and must respond appropriately when COIs arise. As detailed in the Procedures section, all COIs must be disclosed to WHOI annually on the Conflict Disclosure Form and to other third parties as circumstances warrant. The duty of disclosure is ongoing and continuing, and if a new conflict of interest emerges during the year, disclosure must be made within 30 days. Disclosure does not "cure" a COI – conflicts will be reviewed as detailed in the Procedures section to determine if they must be eliminated or may be managed via a Conflict Management Plan.

Further, no Individual may participate in the selection, award, or administration of a contract supported by a Federal award if he or she has a real or apparent conflict of interest. Such a conflict of interest would arise when the Individual, a Close Relative, or an organization which employs or is about to employ any of the parties indicated herein, has a Financial Interest or other interest in or a tangible personal benefit from a firm considered for a contract. The Individual must neither solicit nor accept gratuities, favors, or anything of monetary value from contractors or parties to subcontracts.

Acceptance of a gift or other thing of value from a vendor working (or seeking to work) on a grant or contract funded by the Federal government is also a prohibited COI by federal law. Consistent with avoidance of COI, Individuals and their Close Relatives are prohibited from soliciting any personal gift, gratuity, favor, service, discount or other benefit (collectively, a "gift") from individuals or companies seeking any advantageous action by, or relationship with, the Institution. A gift valued in excess of \$50 or of undetermined value, unless employed for an Institution purpose or shared widely within the Institution, must be declined or returned immediately. Multiple gifts from a single source in any calendar year are prohibited. Employees are prohibited from accepting gifts of money or their equivalent, regardless of the amount, at any time. Gifts of promotional items without significant value that are routinely distributed by vendors to clients, and courtesy copies of professional printed matter, may be accepted.

However, the following normally are not considered COI and are allowed in the following circumstances:

- (1) Gifts, gratuities, favors, entertainments, loans, or any other thing of monetary value received on account of close family or personal relationships when the circumstances make it clear that it is that relationship rather than the business of the persons concerned which is the motivating factor;
- (2) Acceptance of loans from banks or other financial institutions on customary terms to finance proper and usual activities of employees, such as home mortgage loans;
- (3) Acceptance of unsolicited advertising or promotional material, such as pens, pencils, note pads, calendars, and other items of nominal intrinsic value;
- (4) Acceptance of rates and discounts offered to employees as a class;
- (5) Acceptance of food and refreshments of nominal value on infrequent occasions in the ordinary course of a luncheon or dinner meeting or other meeting or on an inspection tour where an employee may properly be in attendance;
- (6) Gifts to the Institution as a whole, not to an employee, agent or officer of the Institution, of minimal or nominal value (such as gifts to WHOI raffles from vendors).

B. Conflict of Commitment

Individuals working half-time or more at WHOI owe their primary professional allegiance to WHOI, and their primary commitment of time and intellectual energies should be to the education and research mission of the institution. Even with such understandings in place, however, attempts of WHOI scientists, engineers, and others to balance WHOI responsibilities with external activities--such as consulting, public service or pro bono work--can result in conflicts regarding allocation of time and energies. Conflicts of commitment usually involve issues of time allocation. Whenever an Individual's professional loyalty is not to WHOI, a conflict of commitment can exist. If a situation that raises questions about a possible conflict of commitment arises, Individuals should disclose and discuss the situation with their Department Chair or the Deputy Director and Vice President for Research (DDVPR).

C. Additional Provisions

Individuals may not use WHOI resources, including facilities, staff, students or other trainees, equipment, or confidential information, as part of their external consulting or business activities or for any other purposes that are unrelated to the education, research, scholarship, and public service missions of WHOI without prior approval from ACECS. Any COIs must be eliminated or managed through an approved Conflict Management Plan.

Individuals working half-time or more at WHOI must not allow other activities to detract from their primary allegiance to WHOI. For example, a WHOI PI must not have significant external Managerial Roles or act as a PI on sponsored projects that could be conducted at WHOI but instead are submitted and managed through another institution (excluding such agreements as WHOI-managed sub-awards or collaborations).

Failure to adhere fully to the provisions on this policy could lead to actions under the WHOI Investigations, Progressive Discipline, and/or Termination policies.

OUTSIDE ACTIVITIES (EXTERNAL ORGANIZATIONS AND START-UPS)

In certain situations, it is appropriate for Individuals to have relationships with an external Organization (including as consultants or in WHOI Start-ups) that may be related to the Individual's experience, training, role and responsibilities at WHOI, as determined solely by WHOI. In these cases, the Individual is required to:

- Separate WHOI duties from personal Financial Interests in the company.
- Separate and clearly distinguish on-going Institution research from external Organization responsibilities or work being conducted.
- For Individuals working half-time or more at WHOI, receive permission from ACECS to consult for the external Organization or be employed in a non-managerial role for any amount of time if related to the Individual's experience, training, role and responsibilities at WHOI. (An Individual must receive permission from ACECS if consulting or employment is not related to the Individual's experience, training, role and responsibilities at WHOI and is in excess of 80 hours per year).
- For Individuals working half-time or more at WHOI, refrain from taking Managerial Roles (except as noted below with Start-ups).
- Make clear that WHOI is the default owner of intellectual property, and that Individuals cannot enter into any agreement that creates copyright or patent obligations that conflict with WHOI's Intellectual Property Policy or an Individual's agreement to assign their rights to WHOI.
- Seek approval in advance from ACECS, before agreeing to a position on an external Organization's board.

Further, no Individual may:

- Negotiate with WHOI on behalf of the Organization, or vice versa.
- Involve WHOI staff in activities at the Organization without prior approval from ACECS.
- Allow Organization personnel to be affiliated with the Institution.
- Involve Organization personnel in WHOI research without prior approval from ACECS.
- Involve WHOI employees, students or post-docs for whom the Individual has supervisory responsibility in company business or research without prior approval from ACECS, and avoid situations in which any WHOI employee might feel expected to be involved.

No external Organization, including any Start-up, may use any WHOI facility, property, or equipment without a Facility Use Agreement in place (at fair market value) and approval by ACECS.

WHOI Start-ups

WHOI has a proud history of entrepreneurial activity and is supportive of its entrepreneurs, keeping in mind that WHOI is foremost an institution of public trust, with a requirement to maintain openness in research. Entrepreneurial activity must be balanced by careful review of the proposed relationships, which may or may not be allowed, and which may require active management to assure openness in research and education and a clear understanding about how conflicts of interest, and WHOI's intellectual property, are to be managed. WHOI is committed to avoiding either perceived or actual conflict issues with respect to Start-ups, which are companies (however organized) where the original intellectual property originates from within WHOI, and where one or more WHOI individuals is a founder and has a Financial Interest in the company, and may have an influential role in determining the direction of the company. Both WHOI and its science and engineering staff have responsibilities to optimize technology transfer and mitigate conflicts of interest when licensing WHOI intellectual property to a Start-up.

In addition to the permissions and prohibitions listed above, Individuals working on Start-ups shall:

- Refrain from involving WHOI students or post-docs in company activities (if a student/post-doc asks to take a leave of absence to participate in the company, refer the individual to ACECS for review of the request and independent advice).
- Refrain from applying for or receiving internal WHOI funds, including salary support from Investment in Science Program (ISP), Independent Research and Development (IR&D), or cost share if the Individual has a Managerial Role with the Start-up without prior ACECS approval.
- Refrain from being a subawardee on any grant, contract, or other vehicle without prior ACECS approval.
- Propose a Conflict Management Plan (CMP) and receive approval from ACECS before engaging in any work related to the Start-up, including before engaging in any Management Role or taking any role or title (e.g., CTO) suggesting management responsibility. Although WHOI discourages the practice, in some circumstances with Start-ups, an Individual may have a Managerial Role if he or she is approved by ACECS after submitting a CMP. The CMP must be updated and approved annually by ACECS.
- Disclose this affiliation and any apparent or actual conflict in any situation where it may not be clear on whose behalf the Individual is operating.

PROCEDURES

Disclosure of COI and COC

Disclosure and consultation continue to be the best means for avoiding conflicts of interest. COI and COC situations are often complex and judgments may differ on whether or not a conflict, in fact, exists.

Disclosure to WHOI does not eliminate the need for Individuals to also disclose to an agency, sponsor, or any other party, including the general public, any potential conflicts of interest in order to ensure transparency and scientific integrity. For example, Investigators who receive funding from Public Health Service must also report Financial Interest using the Addendum Financial Interest Report.

Who must disclose COI and COC?

All Individuals, as defined above, who have an apparent, potential, or real COI or COC.

Who does not need to submit a Disclosure form?

Only MIT faculty with a WHOI faculty appointment and Guest Investigators and Visiting Scholars, each of whom must have received less than \$5,000 annually from WHOI, and MIT-WHOI JP students, are excepted from this policy. The DDVPR in consultation with the General Counsel may, at their discretion, choose to exclude certain affiliates from this Policy.

What must be disclosed?

Individuals must disclose to WHOI whether they or a Close Relative have a COI or COC, including any external professional activities that relate to the Individual's experience, training, role and responsibilities at WHOI, or any external professional activities not related to the Individual's experience, training, role and responsibilities that total more than 80 hours per year, or any Financial Interest in an external Organization that would reasonably appear to be related to their institutional responsibilities. Disclosures of such interests are also required when the Individual is involved in a specific transaction, including gifts; sponsored projects; technology licensing arrangements; material transfer and collaboration agreements; and certain procurements (e.g., sole source or from a privately-held company). When in doubt, disclose.

Disclosure to WHOI does not obviate disclosure to any other party, including public disclosure. If an independent observer might reasonably question whether the Individual's professional actions or decisions are determined by considerations of personal financial gain, the relationship should be disclosed including during presentations, in publications, or other venues.

When to disclose?

The Conflict Disclosure form is to be submitted online not later than January 31st for the previous year's activities. If no activity has been performed, this should be so indicated on the Conflict Disclosure Form.

If a conflict arises between annual reporting, the Disclosure Report form must be updated and the COI reported within 30 days. It is the duty of the Individual to keep the Disclosure Report form current and to update the form as needed during the year. Any new employee or Individual newly affiliated with WHOI will fill out the Conflict Disclosure form at check-in or with their Department. A PI must disclose to the Department Chair or Dept Administrator any potential COI or COC during the creation of a proposal or purchase order. This is in addition to yearly COI and COC disclosure. The Department Chair and Dept Administrator should send this disclosure to ACECS for review. ACECS will make recommendations for management of any potential conflicts. The PI must disclose to the Department early in the proposal process and prior to the routing of the proposal for submission. This to assure that submission is not denied due to an undisclosed COI that has not been reviewed by ACECS.

How are COIs and COCs reviewed?

Supervisors or Department Chairs/Administrators should review the conflict first through Conflict Disclosure Forms, and submit their mitigation plan (e.g., Conflict Management Plan) along with a request for review by ACECS to ACECS@whoi.edu. PIs and other staff with any actual or perceived conflicts of interest should consult with their department chair for advice before submitting to ACECS. Examples of activities to review include:

- All Industry-Sponsored Research or projects;
- Any compensated commitments of a professional or business nature for any amount of time that relates to work at WHOI or work which exceeds 80 hours that does not relate to work performed at WHOI;
- Any proposed consulting arrangements with a company for any amount of time that relates in any way to the work performed at WHOI;

- Opportunities that have a commercial or corporate connection, including technology licensing and transfer;
- Corporate sponsorships, giveaways, partnerships, perceived or actual endorsements of any kind, or other activities;
- Advancement or development opportunities that involve partnerships with any external organization or the use of WHOI's name, logo, or brand;
- All apparent or real COI or COC brought to its attention by a Department Chair or Administrator, or a department in the course of doing business related to WHOI;
- Formal conflict management plans (CMPs) before they go to the DDVPR for final approval.

The goal of the review is to determine what conditions or restrictions, if any, should be imposed to manage, reduce, or eliminate any conflict to ensure that the Institution permits and promotes activities that are aligned with WHOI's mission and values, and maintains the integrity and independence of the Institution and its people. In the event that a COI or COC determination is made by ACECS, it will be reported in writing to the Office of General Counsel, who will advise the DDVPR. The DDVPR makes the determination in writing to the affected employee(s), with a copy to the Director. In addition, ACECS will inform any and all appropriate Institution offices and departments of this action, along with any restrictions and/or conditions that have been imposed as a consequence.

If an Individual elects to appeal the action taken by the DDVPR, the Director will conduct an independent review and his/her determination shall be binding. The Director has the ultimate authority and responsibility to determine when the foregoing policy applies and what steps, including procedural enforcement and sanctions, should be taken to correct a situation deemed not in the best interests of the Institution. WHOI may be required, by law or by conditions imposed by a sponsor, to report a COI and also any failure to report a COI, to the affected project sponsors.

When does Conflict Management and CMP occur?

Some conflicts must be eliminated, but often the Institution can work with the Individual through ACECS to manage a conflict or the appearance of a conflict so that the activity can continue in a way that minimizes the possibility of bias and preserves objectivity. Proper management of a conflict depends on full and prompt disclosure. Furthermore, WHOI recognizes that while an Individual's primary professional commitment is to the Institution, consulting and other forms of independent work can be accepted activities.

If determined by ACECS, an Employee can be required to submit a CMP that must include, at a minimum,:

- Full description of the external relationship(s);
- Identification of the area(s) of potential conflict of interest;
- Management strategies to guard against the escalation of a true conflict of interest (firewall, create an independent review, monitor, or oversight committee, and/or disclosures to the sponsor agency or funding body).

This may also include monitoring of research by independent reviewers; modification of the research plan; disqualification from participation in the portion of the research that would be affected by Financial Interests; divestiture of Financial Interests; or severance of relationships that create conflicts.

A Conflict Management Plan must be submitted and approved by an Individual's Department Chair or supervisor, and then submitted to ACECS for review and approval. *CMPs must be resubmitted annually for review by ACECS and the Supervisor or Department to determine whether the conflict remains mitigated*

Financial Conflict of Interest Policy for Investigator Receiving Funds from Public Health Service Agencies

In addition to the Conflict Disclosure form to be submitted every year or when there is a change in an Individual's situation, Investigators who are funded by a Public Health Service Agency are required:

- a) to take WHOI COI training every 4 years and be familiar with the WHOI Addendum to COI for PHS research, and
- b) at least yearly, fill out the Addendum Financial Interest Report.

Regulations for PHS differ from WHOI and NSF COI and apply to all investigators who are involved in the design, conduct, or reporting of a PHS research project and applies to new proposal, new award, non-competing renewals and new no-cost extensions.

Regulations include:

- Mandatory PHS training least every 4 years. This is the same training as the Institution's COI and COC.

- Broader disclosure requirement of all financial interests that relate to an Individual's institutional responsibilities, including remuneration from non-profit entities and sponsored travel.
- A threshold of \$5,000 annually for "significant financial interests" as defined in the policy addendum "WHOI Addendum to COI for PHS research .

Prior to submitting Public Health Service (PHS) (e.g. NIH, FDA, CDC) proposals or to dispersal of funds from PHS award, WHOI is required assure that all training and financial interest reports are up to date and completed, review and manage as necessary any financial conflict of interest, and report financial conflict of interest and management plan to the PHS agency. WHOI is required to have policy and procedures that are in compliance with the PHS regulations.

Failure to comply with the Policy

Failure to comply with this Policy could lead to actions under the WHOI Investigations, Progressive Discipline, and/or Termination policies, and may result in sanctions, including a formal reprimand in an Individual's personnel file, adverse impact on Individual's evaluation and any potential raises, disclosure to federal agencies and/or the public, and termination of Individual's employment or affiliate status.

FREQUENTLY ASKED QUESTIONS AND EXAMPLES

Question

WHO MUST FILL OUT THE ANNUAL DISCLOSURE?

Answer

All personnel at WHOI -- including scientific and technical staff, administrative staff and all other employees, post-doctoral fellows/ investigators/ scholars, and anyone with a WHOI appointment including visitors, guests, Emeriti, and adjuncts. Only MIT faculty with a WHOI faculty appointment and Guest Investigators and Visiting Scholars, each of whom must have received less than \$5,000 annually from WHOI, and MIT- WHOI JP students, are excepted from this policy.

WHAT MUST BE DISCLOSED?

Any real or apparent Conflicts of Interest (COI) or Conflicts of Commitment (COC).

WHAT IS A CONFLICT OF INTEREST?

A COI occurs when there is a divergence between an Individual's private interests and professional obligations to WHOI such that an independent observer might reasonably question whether the Individual's actions or decisions are determined by considerations of personal financial gain. COIs can be any outside activity, paid or unpaid, which may benefit you or a Close Relative (e.g., spouse, domestic partner, child,

stepchild, parent or sibling) that relates to WHOI, or that relates to your work at WHOI.

WHAT ARE DIFFERENT TYPES OF COI?

Financial (e.g., ownership in entities involved with WHOI or affected by WHOI projects, hiring vendors or independent contractors that are Close Relatives).

Science (e.g., receiving industry funding/or doing consulting work with industry on research related to work performed at WHOI).

Mission (e.g., funding from organizations in conflict with our mission).

Reputational (e.g., greenwashing, or conveying a false impression or providing misleading information about how a company's products/service are environmentally sound).

WHAT ARE SOME EXAMPLES OF COI and COC?

You or a Close Relative owns, operates, or works at an organization that competes with WHOI, or sells (or could sell) materials or services to WHOI.

You or a Close Relative are on the board at an organization that does business with WHOI, or does similar work to any of the work you do for WHOI.

You or a Close Relative have a consulting agreement with a company that does business with WHOI, or that is in the same field as any of the work you do for WHOI.

You have applied for or accepted any industry-sponsored research (e.g., a chemist doing industry research with an oil company)

You hold a tenured position at another institution while a member of the WHOI scientific staff.

You withhold information emanating from any sponsored research to attain personal gain or profit.

You give access to proprietary Institution information to assist an external organization.

You consult under arrangements that impose obligations in conflict with Institution patent or copyright policy or with obligations to research sponsors. (Individuals must contact the Office of Technology Transfer for assistance with drafting standard form consulting agreements.)

Circumstances in which research or other activities that ordinarily would be carried on within the Institution are conducted elsewhere to the disadvantage of the Institution.

You are paid twice for the same work.

You have interactions with suppliers, contractors or subcontractors, or others doing business with the Institution in any way that may give favor based on personal considerations.

You participate in an activity (research project, conference, teaching program, consulting agreement, etc.) on an individual or outside basis:

- that involves or appears to involve the Institution's resources, logo, or reputation,
- that violates any of the principles governing research supported by funds administered through the Institution, or
- that has the potential to inhibit the free communication of ideas among colleagues or restrict availability or dissemination of the results of research.

HOW DO I DISCLOSE?

(1) Take the COI Training online, then (2) fill out the Conflict Disclosure Form. Do not rely on past Conflict Disclosure Forms when filing out the annual form.

DOES DISCLOSURE
"CURE" MY COI?

No. Disclosure is the first step, and then Department Chairs or Supervisors will review and work with ACECS to determine any next steps. Keep in mind that, in addition to the Conflict Disclosure Form to WHOI, you may need to disclose your potential COI to third parties during presentations, in publications, in grant or contract proposal process, or other venues. WHOI is an institution of public trust; Individuals must respect that status and conduct their affairs in ways that will not compromise the integrity of the Institution or that trust.

FORMS and LINKS

Conflict Disclosure form only for Individuals **without** WHOI email and LDAP password

[Link for Conflict Disclosure form for those Individuals **without** WHOI email and LDAP password.](#) This link will not open the Disclosure form for those individuals with WHOI email and LDAP.

Conflict Disclosure form for WHOI employees, Emeriti and affiliates **with** WHOI email and LDAP

[Link for Conflict Disclosure form for those Individuals **with** WHOI email and LDAP password.](#)

Conflict of Interest Training for Individuals **without** WHOI email and LDAP password

[Conflict of Interest training for Individuals **without** WHOI email and LDAP password.](#)

Conflict of Interest Training for Individuals **with** WHOI email and LDAP password

[Conflict of Interest training for Individuals **with** WHOI email and LDAP password.](#)

Conflict of Interest for Public Health Service Agencies

[Public Health Services Agency financial disclosure and training requirements](#)

Financial Conflict of Interest form (for PHS funded Individuals)

Individuals funded by a Public Health Services Agency (e.g. NIH, CDC) must also submit a [PHS Financial Conflict Interest Form](#) (FCOI) to their Department for forwarding to GCS on a yearly basis.

WHOI COI Addendum for Public Health Services Funded Individuals

[WHOI Addendum to WHOI Conflict of interest and Outside Professional Activities Policy Applicable to Public Health Services Funded Investigators.](#)

Facilities Use Agreement

[Contact Office of the General Counsel](#)

Approved by: Mark R. Abbott

Date: September 22, 2020