

Your First Years as PSOM Faculty: Connection to Success

Research & Conflicts of Interest

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The NYT Headlines With Which You Do Not Want Association

The New York Times

Top Cancer Doctor, Forced Out Over Ties to Drug Makers, Joins Their Ranks



Dr. José Baselga will join AstraZeneca, the British-Swedish drug maker, in a new position as head of research and development in oncology. Slaven Vlasic/Getty Images

By [Katie Thomas](#) and [Charles Ornstein](#)

Jan. 7, 2019

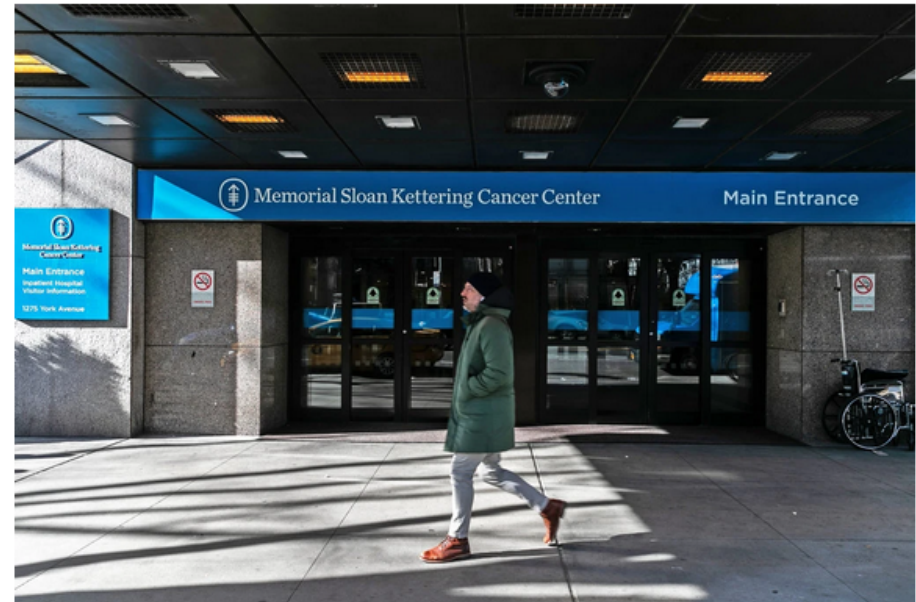


This article was reported and written in collaboration with ProPublica, the nonprofit journalism organization.

Dr. José Baselga, who resigned his position as the top doctor at Memorial

The New York Times

Memorial Sloan Kettering Leaders Violated Conflict-of-Interest Rules, Report Finds




Memorial Sloan Kettering Cancer Center in Manhattan. The center announced an overhaul of its policies on Thursday after an outside review found that top officials repeatedly violated conflict-of-interest rules. Jeenah Moon for The New York Times

By [Charles Ornstein](#) and [Katie Thomas](#)

April 4, 2019





The guidelines of most major medical journals and professional societies ask authors and presenters to list recent financial relationships that could pose a conflict. A 2018 analysis, published as a research letter, in JAMA Oncology found that a third of oncologist authors failed to completely disclose payments from the drug company sponsor.

Wayant C, Turner E, Meyer C, Sinnett P, Vassar M. Financial conflicts of interest among oncologist authors of reports of clinical drug trials. JAMA Oncol 2018. 10.1001/jamaoncol.2018.3738. 30178024

Summary of the Perelman School of Medicine



For calendar year 2019:

2,364 Approximate disclosures received by PSOM
[CHOP based physicians have a separate process]

Estimated percentage who reported
income from at least 1 outside activity **38%**

Most common activities are consulting, paid
speaking and expert witness fees

Our 2019 submissions only identified a total of **7** cases of participation by
faculty on for-profit Boards

[only 4 were reported to be compensated positions]

Conflict of Interest Guidance: Investments in Penn Technology & Fiduciary Obligations

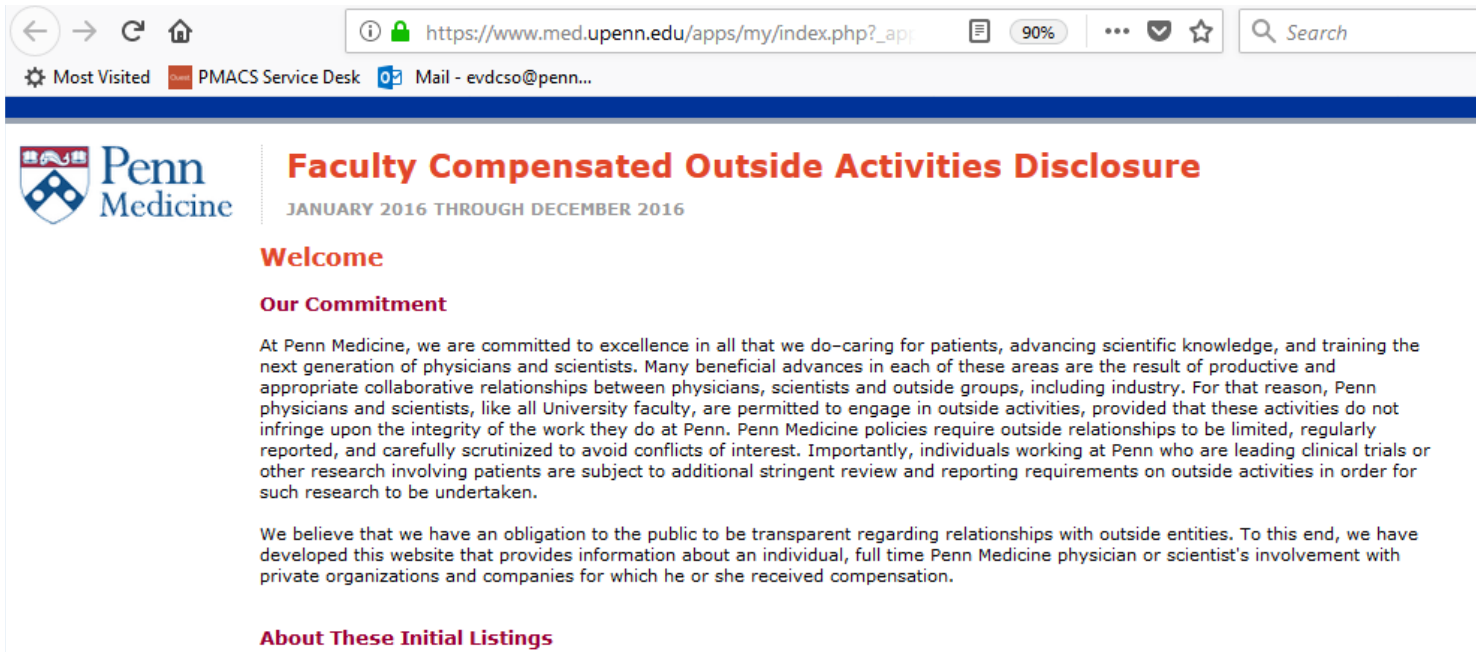


1. No member of the University Board of Trustees, Penn Medicine Board, or Board of Overseers of any School or Center (or a family member) may invest in any Penn start-up company. This restriction precludes the investment of personal assets by any Board member and also precludes Board members from participating in anyway in an investment of assets from a fund or company in which the Board member has a material financial interest. A Penn Start-up company includes any entity that is created to commercialize Penn owned technology or that is expected to or has licensed Penn owned technology.
2. No Penn faculty member or employee may hold a fiduciary position in a Penn start-up company, except as an institutional Penn representative during the period of company formation, with no personal compensation or financial interest.
3. No Penn faculty member, department chair, or officer of the University or Penn Medicine may serve on the Board of Directors of any publicly traded company without prior approval of their department chair, dean, the Provost, or the President of the University, as appropriate.
4. No Penn employee who develops technology using Penn resources, in a Penn initiated project as work for hire, may have a fiduciary or personal financial interest in any Penn Start-up company that was created to commercialize that technology.

PSOM Annual Disclosure

Requires all members of the faculty, academic support staff, Penn Medicine Clinicians, CCA members, clinical faculty and adjunct faculty (who are compensated and/or participate in research) to annually complete an extensive, electronic questionnaire, reporting all outside activities and financial interests on an annual basis

PSOM then posts summaries of those forms on a publicly accessible [website](#)



The screenshot shows a web browser window displaying the Penn Medicine website. The address bar shows the URL: https://www.med.upenn.edu/apps/my/index.php?_ap. The page title is "Faculty Compensated Outside Activities Disclosure" for the period of "JANUARY 2016 THROUGH DECEMBER 2016". The page content includes a "Welcome" section and a "Our Commitment" section. The "Our Commitment" section states: "At Penn Medicine, we are committed to excellence in all that we do—caring for patients, advancing scientific knowledge, and training the next generation of physicians and scientists. Many beneficial advances in each of these areas are the result of productive and appropriate collaborative relationships between physicians, scientists and outside groups, including industry. For that reason, Penn physicians and scientists, like all University faculty, are permitted to engage in outside activities, provided that these activities do not infringe upon the integrity of the work they do at Penn. Penn Medicine policies require outside relationships to be limited, regularly reported, and carefully scrutinized to avoid conflicts of interest. Importantly, individuals working at Penn who are leading clinical trials or other research involving patients are subject to additional stringent review and reporting requirements on outside activities in order for such research to be undertaken." Below this, it says: "We believe that we have an obligation to the public to be transparent regarding relationships with outside entities. To this end, we have developed this website that provides information about an individual, full time Penn Medicine physician or scientist's involvement with private organizations and companies for which he or she received compensation." The page also has a section for "About These Initial Listings".

Reporting Disclosures



By May 1st, annually,
for previous
year's data

- Log into MyDotMed via <http://my.med.upenn.edu/>
- You will then need to log in with your **penkey** and **password**.
- After logging in, please click on **Extramural Activities - Reporting** on the left hand menu



At the time of
proposal or IRB
protocol submission

- [PHS-FTS](#)
- [FIDES](#)



[and other federal agencies]

require the disclosure of personal financial interests that might be related to research. While the term “related” might seem to provide some leeway, it is in your best interest to err on the side of over-reporting. Should you have any questions on what to disclose, please contact the University's [Research Integrity Office](#) at coi@pobox.upenn.edu.



For Extramural Activities

- Prior approval required by Department Chair.

For Research

- For PHS funded research, investigators must disclose all new SFIS within 30 days in PHS-FITS. At JIT or no later than the NOA, they must complete a Grant Relatedness Assessment (even if they have no SFIs) to determine if any SFIs are related. If they have related SFIs, they must submit a second disclosure in FIDES.
- For all other research, disclosure is required at the time of proposal or IRB protocol submission. Disclosure of SFIs is limited to only those that could affect or be affected by the research. Disclosure is made in FIDES.
- For certain types and levels of SFIs in research a designated University committee (CISC) weighs whether, and how such potential conflicts can be managed.

Types of Extramural Activities That Must be Reported



All paid and unpaid activities that are not part of the faculty member's assigned duties but related to your professional responsibilities at Penn Medicine. Examples of extramural activity include, but are not limited to:

- Service on advisory boards and committees
- Providing services to a corporation, business, or industry as an individual officer director, owner, or consultant
- Providing services to an educational institution or governmental agency as a scheduled lecturer or consultant
- Providing services to a private foundation or professional or trade association as a consultant
- Providing services as a voluntary expert witness in any civil or criminal case
- Providing services as an editor or reviewer for professional journals
- CME lectures not sponsored by Penn Medicine

External Commitments



Guidelines for appropriate level of external commitments for academic faculty include:

- Extramural activity cannot interfere with your day job
- University rule of 1/7

II.E.10. Conflict of Interest Policy for Faculty Members

Faculty members should not engage in such extramural associations to an extent that detracts significantly from their availability for normal academic duties. These commitments in aggregate should not exceed one day per seven-day week during the academic year. Exceptions to this shall be permitted only in unusual circumstances and require the specific approval of the President or Provost, the academic dean and the department chair



Principles of Responsible Conduct

Avoidance of Conflict of Interest

Policies, Statements and Guidelines:

[Conflict of Interest General Website](#)

[Conflict of Interest – Trustees: Conflict of Interest Policy June 2000](#)

[Conflict of Interest – Faculty](#)

[Conflict of Interest – Staff](#)

[Guidelines for Extramural Activities](#)

[Policy Related to Copyright and Commitment of Effort](#)

[University of Pennsylvania Health System Guidelines for Extramural Activity of Faculty of Medical Center and Health System](#)

[Guidelines for Institutional Conflicts of Interest for the Leadership and Senior Administration of the University of Pennsylvania Health System](#)

**Responsible Reporting of Suspected Violations and Institutional Response
University of Pennsylvania and Health System Resource Offices**

PRINCIPLES OF RESPONSIBLE CONDUCT

We urge you to read these Principles closely and familiarize yourself with both the expectations and the resources provided.

215-P-COMPLY

If you have questions or concerns about possible violations of policies or legal requirements, contact Penn's Reporting and Help Line at 215-P-Comply (215-726-6759) or www.upenn.edu/215pcomply.

UNIVERSITY POLICIES

General, Student and Academic Life, Research and Sponsored Programs,

The New York Times

Opinion

Transparency Hasn't Stopped Drug Companies From Corrupting Medical Research

The outrage over an influential doctor's hidden millions is misplaced.

By Marcia Angell

Dr. Angell often writes on health policy and medical ethics.

Sept. 14, 2018



Resources



<http://www.upenn.edu/researchservices/exportcontrols.html>

[Policy on Conflicts of Interest related to Research](#)

[Financial Conflicts of Interest in Research Program](#)

[Investigator DecisionTree: The Who, What, Where and When for Disclosure Requirements at Penn](#)

[Guidelines for Staff](#)

