



Policy on Mentor-Trainee Responsibilities Relating to Financial Conflicts of Interest in Research

The Icahn School of Medicine at Mount Sinai (ISMMS) is committed to providing a safe, supportive and productive educational environment for all of its medical students, graduate students, postdoctoral fellows, house staff and clinical fellows (collectively, “trainees”). Central to trainees’ success are the faculty teachers, mentors, co- investigators, and collaborators (collectively, “mentors”) who advise and/or supervise them.

Sometimes, mentors receive income and/or equity from outside entities for providing services in their field of expertise and research. Sometimes, mentors participate in the formation and hold positions in start-up companies related to their intellectual property (IP) that was developed either here at ISMMS or related to previous positions at other academic medical centers. If the ISMMS Financial Conflicts of Interest in Research Committee determines that such financial interests create a conflict that poses potential risks for biasing the design, conduct, and/or reporting of research, the Committee will develop project-specific management plans to protect the integrity of the work.

Trainee assignments should principally contribute to their academic development and advancement. Faculty members may not assign any trainee to any project in which a faculty member has a financial interest without proper disclosure and approval.

In order to ensure that a mentor’s financial conflicts of interests do not adversely influence the instruction, guidance or supervision of trainees engaged in research, the following will apply:

- **Trainee Rights and Responsibilities Under This Policy:**
 - **Training** -- All ISMMS trainees engaged in research must complete the ISMMS Financial Conflict of Interest in Research (“FCOIR”) education module. <[CITI FCOIR Training](#)>
 - **Trainee Questions to Mentors** --Trainees have the right to ask their mentor questions that will help to clarify the mentor’s financial conflict of interest and how it is managed.
 - **Channels for Communication** -- Trainees should feel comfortable that they can discuss concerns about financial conflicts of interest with their mentor(s). If issues cannot be resolved by a discussion with a mentor, trainees should always seek further guidance. Post-docs should seek guidance from the Faculty Director - Office of Postdoctoral Affairs (Dr. Guy Montgomery) and graduate students should seek guidance from the Ombudsman for Graduate Students and Postdoctoral Fellows (Dr. George Huntley). If issues are still unresolved, or a

- confidential consultation is desired, the Office of Research Compliance should be contacted.
- Compensation Prohibitions – Trainees are not ordinarily permitted to receive compensation from a company in which the mentor has a financial interest. Under unusual circumstances, an exception may be granted with the approval of the Dean for Academic and Scientific Affairs upon consultation with the Financial Conflicts of Interest in Research Committee; in such cases a management plan will be created by the committee to ensure that the financial interests held by the trainee do not put the integrity of the research at risk.
 - Trainee Disclosure – Trainees must disclose their own financial interests relevant to research to their mentor prior to or at the time that a position is offered. Trainees must also provide project-specific disclosures to the Financial Conflicts of Interest in Research Office if they are named participants on a grant application.
- **Mentor Responsibilities Under This Policy:**
 - General Disclosure to Trainees: Mentors must disclose their general financial interests to a trainee prior to or at the time that the trainee is offered a role on the mentor’s research team, and must explain how, conflicts, if any, are being managed.
 - Project-Specific Disclosure to Trainees: Before a trainee may be involved in any specific research project, the trainee’s faculty mentor must provide a clear description of the following to the trainee:
 1. The source of funding of the specific research project (industry or otherwise);
 2. Any financial interest(whether Income or Equity) held by the faculty member or related party in a business that provides research support to the project;
 3. Any financial interest(whether Income or Equity) held by the faculty mentor in a business whose drug, device or technology is being investigated in the project
 4. Any Intellectual Property held by the faculty member or related party whose value could be effected by the outcome of the research; and
 5. Any restrictions that may be imposed on the timing of the communication of scientific data related to any of the financial interests.
 - Mentors are not permitted to require that trainees participate in projects that could constrain the trainees’ ability to freely discuss, defend, and publish their research;
 - Mentors cannot put trainees in a position of having to choose between challenging/confronting the mentor and engaging in research about which the trainee has concerns because of the mentor’s financial interests.
- **Institutional Responsibilities Under This Policy:**
 - Assignment of Co-Mentor -- When students work on projects on which the mentor has a financial conflict of interest, the dissertation committee Chair or

- Training Area director will identify a co-mentor without a financial conflict of interest. When postdoctoral fellows work on projects on which the mentor has a financial conflict of interest, the Director of Postdoctoral Affairs will consult with the fellow and mentor to identify an appropriate, non-conflicted co-mentor.
- Management Plan Access -- The Financial Conflicts of Interest in Research Committee will make relevant management plans available upon request to address concerns raised by a trainee or mentor.