



Conflicts of Interest Office
Icahn School of Medicine at Mount Sinai
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TO: All Full-Time Faculty and Physicians

FROM: Dennis S. Charney, MD
Anne and Joel Ehrenkranz Dean
Icahn School of Medicine at Mount Sinai
President for Academic Affairs
Mount Sinai Health System

Kenneth Brower
Director, ISMMS Conflicts of Interest Office

DATE: July 21, 2015

RE: Consulting and Other Paid Activities

Please be reminded that if you wish to serve as a consultant or in another paid capacity for an external organization and retain the associated income, you must comply with all Mount Sinai policies and procedures. Prior to entering into an arrangement please email the following to the School's Conflicts of Interest Office (kenneth.brower@mssm.edu):

- Attestation of Compliance Form (attached) signed by you as well as by your Chair or his/her designee
- Written agreement from the external entity*
- The invitation you received from the company contact, so that the COI Office can follow up with the company if necessary.*

The COI Office will inform you when you can proceed with the activity.

If you have any current agreements which have not been approved by your Chair and /or submitted to the COI Office, for each agreement please email the three documents described above to Mr. Brower immediately.

Relevant policies are posted in the Faculty Handbook, including [Section E. Policy on Financial Relationships with Outside Entities](#) and the [Policy on Speaking Engagements](#). Highlights of these policies include:

- The aggregate number of days permitted for paid activities with outside entities may not exceed 52 per year, including weekends and holidays;

- Outside arrangements may not take precedence over, or conflict with, any of your responsibilities as an Icahn School of Medicine faculty member and/or Mount Sinai physician;
- You must obtain your Department Chair's (or designee's) approval for all paid outside activities, using the Attestation of Compliance form (attached);
- Except for speaking engagements at other academic institutions, CME events, and medico-legal consulting, all paid arrangements with external entities must be set forth in a written agreement and submitted to the COI Office for review;
- Except for use of Mount Sinai's library resources and the de minimis use of your office and personal computer, you may not use any School facilities or personnel in the performance of your outside arrangement;
- You may not function as a private individual in any of the following capacities:
 - Practitioner of medicine
 - Employee of a third party
 - Principal investigator of a research project
 - Director of a research effort of the third party;
- Arrangements must never involve product or company endorsements or be marketing or promotional in nature;
- Speakers must retain full control of the content of their presentations. You must prepare your own materials and you may not utilize company-prepared slide decks;
- Compensation must be within fair market value, meaning that the payment must be reasonable in relation to the services rendered and must resemble what others with similar expertise might be paid for a similar work effort;
- You must disclose all arrangements on your online Annual Report of Relationships with Outside Entities within one week of receiving clearance from the COI Office.

Mr. Brower and his team are available to answer your questions and assist you in your compliance with Mount Sinai's policies and processes.

** Submission of a written agreement and company invitation are not required for invited presentations at other academic medical centers, CME presentations, or for medico-legal consulting.*