Conflict of Interest Training

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What Is a Conflict of Interest?

Situations in which an individual’s or family member’s financial, professional, or other personal considerations may directly or indirectly affect, or have the appearance of affecting, the individual’s professional judgment in exercising any University duty or responsibility.
Why Do We Need a COI Policy?

- To safeguard the public’s trust and confidence in Vanderbilt as a hospital, academic center, and research institution
- To protect BOTH the University’s and the faculty/staff member’s reputation and interests
- Many sponsors require it as a condition to receiving funding under contracts and grants
Types of Conflicts of Interest

Actual or Perceived

Vanderbilt Interests and Duties

Personal Interests
* Business Relationships
* Gifts and Contributions
  University Assets
  Student Activities
* Family Members
* Conflicts of Commitment
  Research Activities

Personal Interests or Loyalties
Business Relationships with VU

- Avoid situations in which you or a family member has a business relationship with VU
- Includes businesses of your spouse, children, parents, and other relatives
- Can generally be managed by removing yourself from any Vanderbilt decisions involving those businesses
- Should always be disclosed!
Gifts and Contributions

• Members of the University should not accept gifts or accommodations if doing so puts them in a prejudicial or compromising position.

• Individuals may accept gifts, meals, entertainment, etc. worth no greater than $300/year/vendor from NON-HEALTHCARE INDUSTRY sources.

• Absolutely no gifts or contributions of any kind may be accepted from Healthcare.

• Gifts to the University should generally be directed through the Development and Alumni Relations Office.
Family Members

• Members of the University may not participate in the hiring process or employment-related decisions regarding their family members

• Members should not be in a position to supervise a family member, or review a family member’s work
Conflict of Commitment

• Distribution of effort between University employment and commitment to external activities

• External activities include:
  – Outside employment
  – Community service
  – Consulting

• Staff do not have allotted consulting days and are required to take vacation days for approved consulting time
Disclosure Process

- Disclosure
- Review
- Determination
- Establish Mgmt Plan
- Oversight
Conflict Disclosure

• Who: Everyone – all VU Faculty and Staff

• When: Initial employment, annually, upon changed circumstances

• Where: Online web-based system

• How: Login with your VUNetID and e-password
Disclosure Review

• Initial review by Approver

• Second level review by the Office of Conflict of Interest and Commitment Management

• Third possible review by the UCC
  – Institutional COIs (i.e., University also a party)
  – Human subjects research
  – No decision reached by other reviewers
  – Appeals from adverse decisions
Considerations for Review

• Does the disclosure constitute a conflict of interest?

• If it is a conflict, can it be managed?
  – If so, what requirements should be included in the management plan?
  – If not, disclosure should be presented to the UCC for resolution (e.g., cease and desist)
Managing Conflicts of Interest

• Having a conflict does not necessarily mean the activity is prohibited → often all that is needed is a management plan
• A management plan is used to limit the risks of the conflict, both to the University and the faculty/staff member
• Development of, and initial oversight for, management plans remains a duty of the Approver
• Contact the OCOICM with any questions
Access the Conflict Disclosure System anytime at:

https://webapp.mis.vanderbilt.edu/coi/
Welcome to the Vanderbilt University Conflict Disclosure System

Vanderbilt University expects that all members of the Vanderbilt Community devote their primary professional loyalty, time, and energy to the service of the University in fulfilling its education, research, patient care, and public service missions.

Members are expected to evaluate and arrange their external interests and commitments to avoid compromising their ability to carry out their primary obligations to the University, and most conflicts should be generally avoided or resolved through the exercise of individual judgment or discretion.

All members are expected to:
- Abide by the conflict of interest and commitment policies and standards;
- Fully disclose any professional and relevant personal activities, at least annually, or when a potential conflict arises;
- Remedy conflict situations or comply with any management or monitoring plan prescribed;
- Remain aware of the potential for conflicts;
- Take the initiative to manage, disclose, or resolve conflict situations as appropriate.

This system provides you with a tool to record policy awareness, potential conflicts, and the management of any potential conflicts disclosed. You will be given a set of questions to help you identify potential conflicts, links to the policies, and the ability to provide details about potential conflicts you do report. Once you have submitted your information, your approver will be able to use the system to review your information and, if needed, create a management plan. Overseers of conflicts compliance will review what has been submitted and make any additional recommendations.

At any time you may use the link on the left to access the Frequently Asked Questions page if you would like help using the system.
Questions?

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http://www.vanderbilt.edu/compliance/conflictofinterest.php