VANDERBILT UNIVERSITY
CONFLICT OF INTEREST AND COMMITMENT POLICY

Training for Staff Members
Individual conflicts of interest refer to 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, an individual’s professional judgment in exercising any university duty or responsibility, including the conduct or reporting or research.
Why is this policy important?

- **Public Trust & Confidence**
  - The policy helps protect the trust and confidence that the public has in Vanderbilt as an academic center and research institution.

- **Individual & Institutional Reputations**
  - Without the policy, individual and institutional reputations could be harmed.

- **Sponsored Research Requirements**
  - Many research sponsors require it in their contracts or grant terms and conditions.

- **Protecting YOU & Vanderbilt**
  - The policy serves to protect BOTH the University’s interests and the interests of the faculty and staff who are disclosing.
Creating a Conflict Disclosure

Who?  Everyone – all VU Faculty and Staff

When?  Every year and ALSO when your circumstances change (within 30 days of a new significant financial interest).

Where?  Online - https://webapp.mis.vanderbilt.edu/coi/

How?  Login with your VUNetID & e-password
Highlights of COI/COC Policy

- Personal Interests in Vanderbilt Activities
- Business Relationships with Vanderbilt
- Gifts and Contributions
- University Assets
- Student Activities
- Family Members
- Conflict of Commitment
- Research Activities
1. Personal Interests in VU Activities

Avoid decisions on behalf of the university when you have a personal interest or an APPEARANCE of a personal interest in:

  Hiring
  Purchasing
  Contracting/Consulting
2. Business Relationships with VU

- Avoid Situations wherein you or a family member has a Business Relationship with VU.
- This includes spouse’s, children’s, and parents’ businesses.
3. Gifts and Contributions

- **NO** gifts or accommodations may be accepted by the University or individual members of the University if this puts them in a *prejudicial* or *compromising* position.

- Gifts in support of the institutional mission must be directed through the Development Offices.
## Gifts to Individuals

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<th>Non-Healthcare Industry</th>
<th>Healthcare Industry</th>
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<td>You may accept gifts, meals, entertainment, etc. no greater than $300/year/vendor.</td>
<td>You may accept NO gifts of any value ($0).</td>
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4. Use of University Assets

- Misappropriation or unauthorized use of University assets in connection with external activities not allowed.

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<th>What are University Assets?</th>
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<td>Buildings, personnel, equipment, patents, technology, and (perhaps most importantly) the University’s reputation.</td>
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- Protection of the University’s reputation means that even implied endorsements of other businesses or entities are prohibited.
5. Student Activities

- Unless an approved management plan is in place, students, postdocs, or other trainees should not be assigned University projects sponsored by a business if the supervising faculty member or the faculty member’s family member has a significant financial interest in the business.
6. Activities with Family Members

- University employees **may not** participate in the hiring process or employment-related decisions regarding their family members.

- University employees **may not** be in a position to supervise a family member or review a family member’s work.
7. Conflict of Commitment

- Distribution of effort between University employment and commitment to external activities.
- Staff do not have allotted consulting days and are required to take vacation days for any outside activities/commitments.
- Faculty members have allotted consulting days based on their appointment type.
Conflicts of Interest in Research are situations in which financial, professional, or personal considerations may compromise (or may appear to compromise) an investigator’s judgment in design, conduct, or reporting of research.
You should **not** be involved in the review, approval, or control of research if you or a family member has a SIGNIFICANT FINANCIAL INTEREST (unless a COI management plan has been put in place to protect the integrity of the research).

This is especially important if you are doing Human Subject Research as no research will receive final approval until the conflict of interest is addressed.

NSF, PHS, and FDA have specific guidelines regarding conflicts of interest.
What is a Significant Financial Interest (SFI)?

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<th>Equity</th>
<th>Travel</th>
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| ≥$5000 per year in payments is an SFI | • Non-Publicly Traded Co. = Any equity is an automatic SFI.  
• Publicly Traded Co. = ≥$5000 in equity value is an SFI. | Travel may also be an SFI, so all travel that is paid by third parties (not VU) and is related to your institutional responsibilities must be reported (for PHS-funded faculty/staff only*). |

- There are specific exclusions from SFIs under the PHS regulations. (See the PHS website link below for more details).
- Investigator Training
  
  - **FCOI training is required** for Investigators before engaging in PHS-funded research, and immediately under designated circumstances.

Many funding sources now follow the PHS regulations!

For more information about the regulation, please visit: [https://grants.nih.gov/grants/policy/coi/index.htm](https://grants.nih.gov/grants/policy/coi/index.htm)
Review of COI Disclosures
What happens when you submit a disclosure?

INITIAL REVIEW
Approver (as designated by the Dean or Vice-Chancellor)
*All disclosures

SECOND REVIEW
Office of Conflict of Interest and Commitment Management
*Disclosures with conflicts

THIRD REVIEW
University Conflicts Committee
*Only in limited circumstances
Considerations for Review

- Does this disclosure constitute a conflict of interest that requires management?
- If it is a conflict, can it be properly managed?
- If it can be managed, what requirements should the management plan contain?
- Conflicts that cannot be managed are presented to the UCC for resolution (i.e., cease and desist or other actions).
Management Plans

- Plans are put into place to limit the risks to the University and the faculty/staff member with the conflict. Some plans also protect the integrity of research.
- Having a “conflict” does not necessarily mean an activity is prohibited. In most cases, all that is needed is a management plan.
- Initial oversight of all management plans remains a duty of the approver.
- Questions about implementation of a management plan may be brought to the COI Office at any time.
The Office of Conflict of Interest and Commitment Management strives to provide excellent services to our customers, and our website includes many conflict of interest resources. Please feel free to contact us if you have any questions or would like our office to provide conflict of interest training to your University department.

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