

TRAINING FOR STAFF

VANDERBILT UNIVERSITY CONFLICT OF INTEREST AND COMMITMENT POLICY



VANDERBILT



UNIVERSITY

WHAT IS A COI?

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 & Staff

- **When?**

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

- **Where?**

- Online – <https://vanderbilt.ospreycompliancesuite.com/coiriskmanager/>

- **How?**

- Log-in with your VUNetID & password

IMPORTANT COI/COC TOPICS

- 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 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.

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.

3. GIFTS AND CONTRIBUTIONS CONT.

Gifts to Individuals

Non-Healthcare Industry	Healthcare Industry
You may accept gifts, meals, entertainment, etc. no greater than \$300/year/vendor.	You may accept NO gifts of any value (\$0).

4. USE OF UNIVERSITY ASSETS

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

What are University Assets?

Buildings, personnel, equipment, patents, technology, and (perhaps most importantly) the University's reputation.

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 to 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 or faculty appointment 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.

8. RESEARCH ACTIVITIES

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.

8. RESEARCH ACTIVITIES CONT.

- 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 Subjects 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 CONSTITUTES A SIGNIFICANT FINANCIAL INTEREST (SFI)?

- An SFI is a financial interest that is **related to** your institutional responsibilities, or your scholarly field of work at the University.
- The general idea is that this is a financial interest which could be *perceived* as related to your field of work such that it might create the appearance of bias.
- The chart below explains what qualifies as an SFI.

Income/Compensation	Equity	Travel
≥\$5000 per year in payments is an SFI	<ul style="list-style-type: none"> • Non-Publicly Traded Co. = Any equity is an automatic SFI. • Publicly Traded Co. = ≥\$5000 in equity value is an SFI (or aggregate of ≥\$5000 in combined annual income and equity). 	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 (<u>for PHS-funded faculty/staff only</u>).

PHS-FUNDED RESEARCH (OR RESEARCH FROM A FUNDING SOURCE THAT FOLLOWS PHS REGULATIONS)

Significant Financial Interests

- PHS regulations require disclosure of all **Significant Financial Interests (SFIs)**.
- The definition of SFIs used throughout the Vanderbilt University Conflict of Interest and Commitment Policy is derived directly from PHS regulations.

Travel

- PHS funded faculty and staff are required to disclose travel reimbursed or paid and not funded through Vanderbilt University.

Investigator Training

- Financial Conflict of Interest (FCOI) training is required for Investigators before engaging in PHS-funded research, and immediately under designated circumstances. A link to the training and training certification is part of your COI/COC disclosure form.
- Many funding sources follow the PHS regulations. For more information about the regulation, please visit: <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

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.

OFFICE OF CONFLICT OF INTEREST AND COMMITMENT MANAGEMENT

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.

CONTACT US

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Visit our website for additional resources:

<https://www.vanderbilt.edu/generalcounsel/conflictinterest/index.php>

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