



VANDERBILT UNIVERSITY
Office of the General Counsel
Conflicts of Interest and Commitment Management

Training for COI Reviewers

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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 design, conduct, or reporting of research.
- A COI may occur any time an individual's interests outside Vanderbilt may interact in any way with the individual's role at Vanderbilt.
- Common examples include financial interests, family members, and extra jobs.



Why is this policy important?



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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 Individuals & Vanderbilt

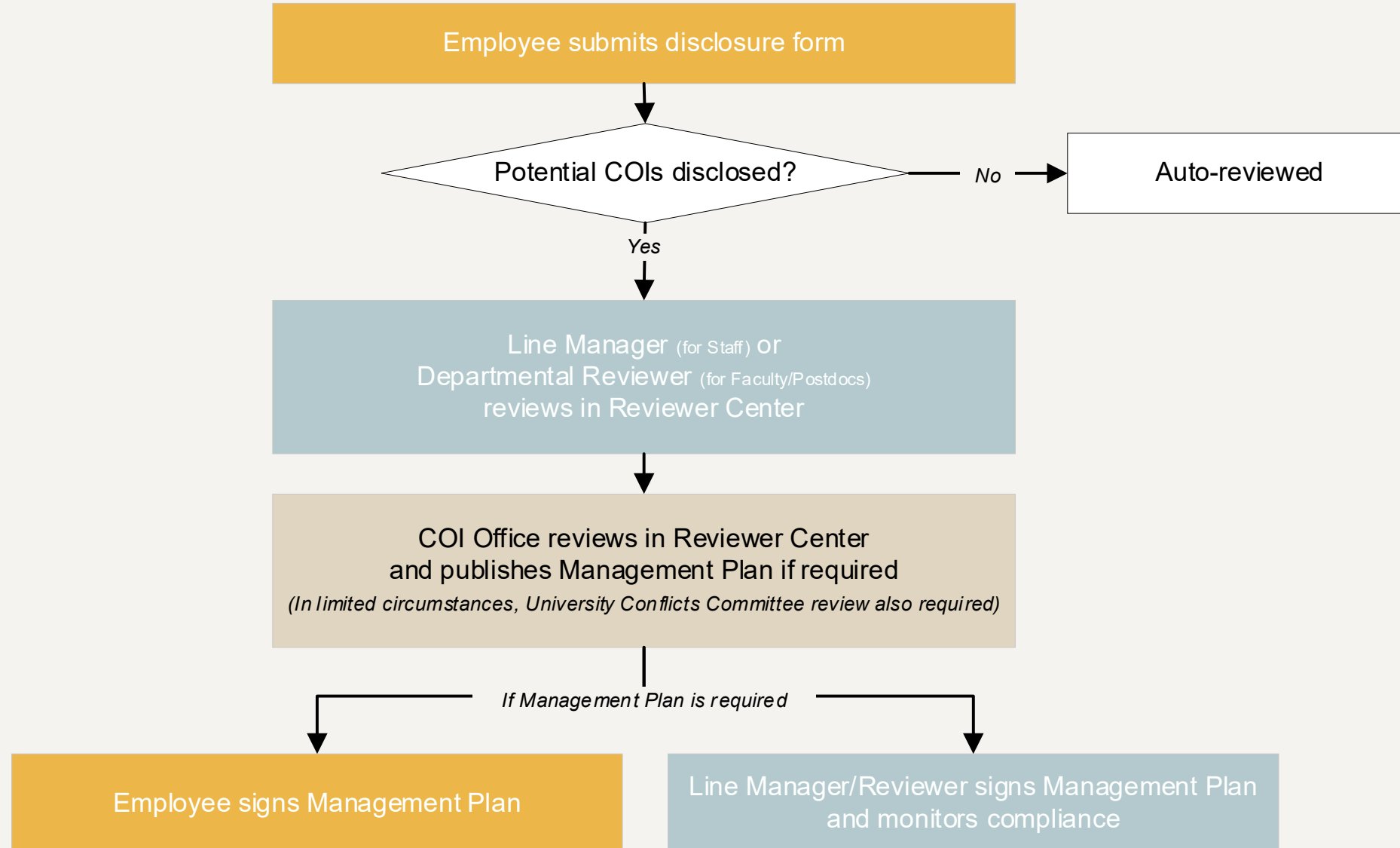
- The policy serves to protect BOTH the University's interests and the interests of the faculty and staff who are disclosing.

Who are COI Reviewers?

Reviewers are tasked with reviewing conflict disclosures and ensuring any required management plan is followed.

- For **University faculty and postdocs**, the Reviewer for each department is assigned by the Dean.
- For **University staff**, the Reviewer is each discloser's line manager.

Conflict Disclosure System Workflow



Basic Reviewer Duties



Review Disclosures

- Thoroughly read and review ALL disclosures submitted to you.
- If the information disclosed is sufficient to determine whether a management plan is necessary, submit your review and comments.
- If information is missing or unclear, follow up with the discloser and request they resubmit.

Create Management Plans

- If a conflict requires a management plan, create a plan from the pre-written plans in the Conflict Disclosure System, or you may consult with the COI Office to develop a plan.

Sign Management Plans

- Certify receipt of the management plan by signing the plan.
- Monitor the situation to ensure the plan is followed during the year.

Considerations for Review

Does this disclosure constitute a conflict of interest that requires management?

If it is a conflict, can it be properly managed?

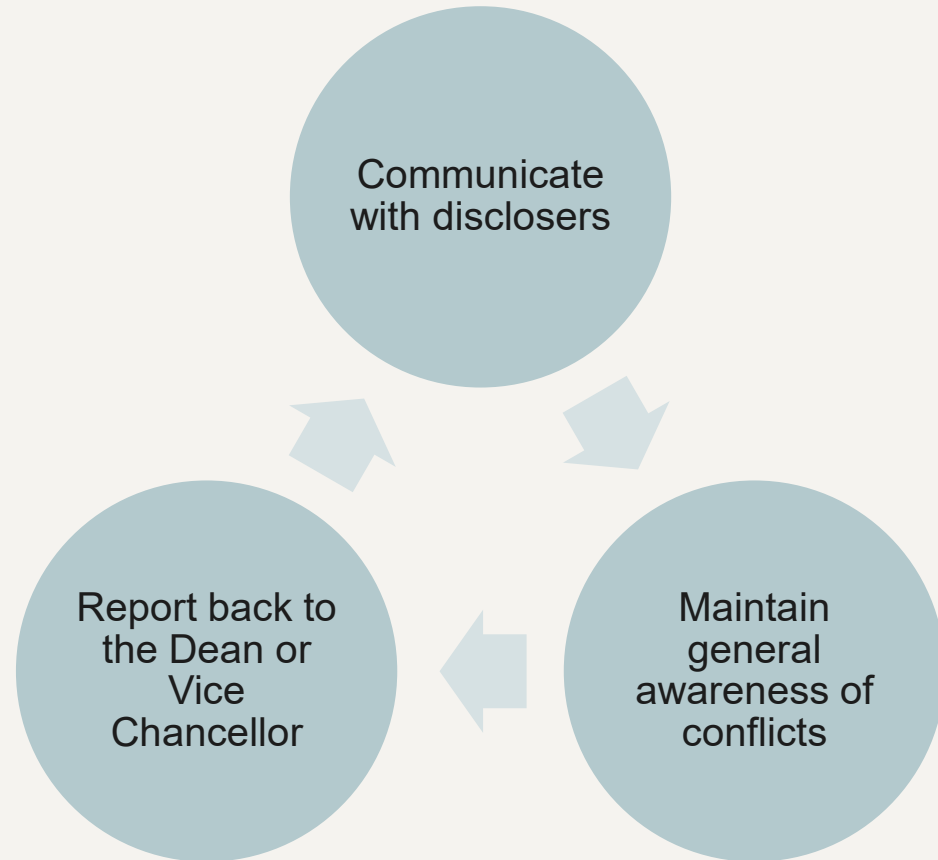
If it can be managed, what requirements should the management plan contain?

Conflicts that cannot be managed may be presented to the University Conflicts Committee for resolution (i.e., cease and desist or other actions).

High Level Reviewer Duties



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Reviewers are considered designees of the Dean or Vice Chancellor.

- Your review of a disclosure is viewed as the Dean's or Vice Chancellor's review.
- Maintain knowledge and understanding of ongoing conflicts of interest and commitment in your area.
- Report information to the Dean or Vice Chancellor to ensure awareness and consistency.

Additional Reviewer Duties

If needed, **assist the COI Office in obtaining disclosures** during the annual disclosure process.

If novel questions arise, **act as a liaison with the Dean or Vice-Chancellor** to determine how a school/area wants to address a conflict situation.

Remain available as a resource for employees completing disclosures.

Contact the COI Office for assistance if you have reason to believe that any person completing a disclosure does not understand the questions (due to complexity or due to a language barrier).

Frequently Asked Questions for Reviewers



How soon should I review a disclosure submitted to me?

- **As soon as possible!**
- **Federal regulations have many time-related requirements. If you fail to approve a disclosure, research funding may be at risk for your school or area.**
- **Reviews may be needed throughout the year (not just during the annual disclosure process). Complete any needed reviews through the disclosure system on a weekly basis, so that you can ensure compliance with rules and regulations.**



What happens if I fail to review disclosures in a timely manner?

- You may be putting federal funding at risk!
- The University has no more than 60 days to report back to some funding agencies about potential conflicts.
- If the reviewer does not complete the process in a timely manner, the COI Office and the University Conflicts Committee cannot review and potentially implement a management plan as required by COI policy and federal regulation.

Does the COI office review a disclosure before the reviewer?

- **NO! The COI Office is one of the final steps in the COI review process. No notifications go to the COI Office until the reviewer has completed the initial review process!**
- **Timely review by the reviewer is necessary to the process.**



What are the reviewer duties after a management plan is put into place?



- **As a reviewer, you have been assigned the duty to be aware of the existence of the conflicts of the faculty, postdocs, and staff members in your area and to be knowledgeable about the contents of their assigned management plans.**
- **Reviewers have the task of ensuring that the management plan is implemented in a timely fashion and is followed by the faculty, postdoc, or staff member.**
- **It is also the reviewer's duty to monitor any changes in the conflict situation and determine whether the management plan should be adjusted based on those changes.**

What if the conflict changes or goes away when there is a management plan in place?



- **If a conflict changes, the faculty/postdoc/staff member should inform their reviewer or supervisor and create a new disclosure in the system indicating the changes to the conflict.**
- **The reviewer and the COI Office will review the new disclosure to determine if the management plan needs to be changed.**
- **Likewise, if a conflict is removed, the faculty/postdoc/staff member should inform their reviewer or supervisor and create a new disclosure in the system. The COI Office will review the new disclosure and the comments of the reviewer to determine whether a management plan is still required.**

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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<p>Visit our website for additional resources: www.vanderbilt.edu/generalcounsel/conflictinterest</p>