Auburn University Financial Conflict of Interest (FCOI) Policy for Research and Related Activities

HISTORY

• Provost Mazey initiated an FCOI Policy
• Faculty Research Committee facilitated policy development
• Provost Boosinger and VPRED Mason provided input
• AU Senate approved the Policy in January, 2015
• OVPRED implementation in progress

APPLICABILITY

“Affected Employee”:

• “Faculty (as outlined in the Faculty Handbook) and other employees....This could include, but is not limited to, tenure and non-tenure track faculty, post-doctoral fellows, and/or graduate students.”

Categories of Affected Employees subject to the Policy are:

(1) Responsible for Sponsored Research.
   o Affected Employees “responsible for the design, conduct or reporting of sponsored Research.”

(2) Engaged in Technology Commercialization Activities.
   o Affected Employees engaged in the "[m]arketing, licensing, or conveyance of rights to intellectual property, technology, and know-how into the private market."

(3) Engaged in Related Activities.
   o Affected Employees “engaged in any undertaking which has the potential to improperly influence sponsored Research or Technology Commercialization.”
   o “Examples include, but are not limited to: equity interest in or remuneration from a non-publicly traded entity or providing outside services of a professional nature."

DISCLOSURE REQUIREMENTS

Significant Financial Interests (SFI) of the Affected Employee (and their Immediate Family) that reasonably relate to the Affected Employee’s Institutional Responsibilities:

• Publicly traded entity: equity interest and remuneration exceeding $5,000
• Non-publicly traded entity: equity interest of any amount
• Non-publicly traded entity: remuneration exceeding $5,000
• Intellectual property: receipt of income of any amount

This is an overview. Details can be found in the AU FCOI Policy and related Procedures. (Rev. 10-19-2015)
DISCLOSURE AND REVIEW PROCESS

Each Affected Employee:

- Obtains a user account in the COI-SMART secure online disclosure system
- Completes a disclosure questionnaire in COI-SMART (takes about 10 - 15 minutes)
- Updates their questionnaire at specified times

University Reviewer: Reviews the disclosure questionnaire if an Affected Employee discloses a SFI

- Reviews before the Affected Employee spends any Research funds, engages in Technology Commercialization activities or engages in Related Activities
- Determines whether the Significant Financial Interest is a Financial Conflict of Interest
- The Reviewer works with appropriate administration and the Affected Employee to manage any conflict
- “As long as Significant Financial Interests are disclosed and financial conflicts are managed, reduced, or eliminated; they need not be a problem.”

DISCLOSURE TIMEFRAME

Initial disclosure questionnaire completed for new/active awards and engagements

Updated disclosure questionnaires completed for:

- New sponsored Research awards and modifications of scope of work for existing awards
- New Technology Commercialization activities
- New Related Activities
- Within 30 days of discovering or acquiring an unreported SFI

IMPLEMENTATION

Goal: Support Sponsored Researchers by easing Affected Employees as smoothly as possible into compliance

Significant behind-the-scenes examples:

- Uploaded new users into COI-SMART through batch processing from OSP database
  *Saves most Affected Employees the step of individual registration
- Revising the online disclosure questionnaire to streamline for all research sponsors and related activities

Communication and Support

- Close coordination with partnering offices in OVPRED and others involved in research administration to communicate consistently and enhance compliance across all colleges and schools
  - ORC Research Integrity training and providing resources
- Creation of new AU FCOI Policy website structured to facilitate quick navigation to compliance details
- Planned “FCOI Labs” with real-time, hands-on support for researchers by ORC Research Integrity

HOW THE AU FCOI POLICIES FIT TOGETHER

New FCOI Policy is the over-arching policy statement for AU, which is intended to maintain the integrity of all sponsored research and related activities and to support AU’s compliance with federal FCOI requirements, i.e.

- The National Science Foundation (NSF) and the Public Health Service (PHS) have specific FCOI requirements