

Office of Audit, Compliance & Privacy

Office of the Vice President for Research

# Changes to Conflict of Interest Disclosures

### Goals

- Reduce employee, investigator & institutional liability
- Clarify disclosure requirements
- Streamline & Standardize
- Improve operational efficiency in research disclosures.



## Reasons for changes

- University wide COI/COC disclosure
- Help employees avoid violations of Auburn University Policy
- Comply with AL State Ethics Law
- R1 status and elevated profile
- Institutional implications & central monitoring
- Capture ALL research disclosures (PHS, NSF, other) in the general employee disclosure.



## **Implementation Plans**

- ▶ Target start date October 1, 2019
- ALL employees disclose annually
- Researchers will complete one disclosure annually that satisfies research COI requirements and Auburn COI requirements
- Update new SFI, COI, or COC within 30 days
- Research Integrity will address research specific COI
- OACP and Research Integrity will collaborate as needed for Management plans



#### **Disclosures**

- ALL Fulltime Employees disclose:
  - Board/leadership roles, financial interests in business entity or related to AU expertise/responsibilities
    - Applicable Research related SFIs
  - Outside employment/professional activities (w/in 12 mo.)
  - Personal relationships that could affect administrative decisions (employment, pay, purchasing, etc.)
  - Immediate family working at AU (AUM, AAES, ACES)
  - Any other potential conflicts of interest



## **Management Plans**

- If conflict identified that needs management, employee and supervisor will be notified via email
- Template management plans and guidance provided
- One management plan per employee as needed
- Supervisor work with employee to tailor to that particular situation
- Periodically review and monitor to ensure plan is followed.
- Research Integrity develops plans related to research only COI



## Role of Research Integrity

- Collect & monitor all Research SFI disclosures (PHS, NSF, other)
- Coordinate COI mgmnt. plans with OACP
- Communicate directly with investigators if desired
- Resource & support for CLDs, other research admins, & faculty



## **Role of Compliance & Privacy**

- Collect & monitor all COI disclosures
- Implement mgmt, plans as needed
- Communicate with employees and supervisors
- Resource & support for staff, A&P, faculty, admin
- Consult University COI Committee as needed
- Preserve public trust in Auburn University operations
- Promote a culture of compliance and ethics at AU

