

# AUSPAN

## October 19, 2015

### 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.
  - Affected Employees “*responsible* for the design, conduct or reporting of sponsored Research.”
- (2) Engaged in Technology Commercialization Activities.
  - 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.
  - Affected Employees “engaged in any undertaking which has the potential to improperly influence sponsored Research or Technology Commercialization.”
  - “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

## 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