WHAT IS A RESEARCH CONFLICT OF INTEREST?

“When an employee is in a position to make a decision in the conduct of his or her research that may result in personal or family gain, financial or otherwise”

-- OSU Policy on Research Conflicts of Interest

A financial, research conflict of interest can occur when a significant financial interest has the ability to bias the design, conduct and/or reporting of research.

Conflicts of interest exist within the University setting as faculty are encouraged to become more involved in industry and professional development outside of the University. It is not the intent of the COI policy to restrict faculty from outside activities, rather to identify when conflicting interests may appear to exist and to manage them appropriately to ensure the integrity of OSU research and the University, as well as maintain the public’s trust.
Research COI Schematic—Examples

- Oregon State University
- External Activities

Investigator:
- Financial Interest:
  - Remuneration of $5,000 or more
  - Equity of $5,000 or more in a public entity
  - Any equity in a private entity

- Research Objectivity
- Design, Conduct and Reporting

External Entity:
- Relationship:
  - $ or % Threshold
- Overlap of Interests:
  - Funding
  - Collaboration
  - Research Field

Examples:
- Ownership
- Employee
- Officer
- Consultant
WHAT IS NOT A RESEARCH CONFLICT OF INTEREST?

- **Nepotism**: The hiring of a family member or member of your household
  - HR Policy: [http://oregonstate.edu/admin/hr/policies.html](http://oregonstate.edu/admin/hr/policies.html) (under Nepotism heading)
  - Oversight: Academic units

- **Conflict of Commitment**: Conflicts of time commitment between outside activities and University responsibilities
  - Policy Home: Academic Affairs
  - Oversight: Academic Affairs and academic units (departments)
  - HR Request for Approval of Outside Activities form and COC policy: [http://oregonstate.edu/admin/hristeam/outemp.pdf](http://oregonstate.edu/admin/hristeam/outemp.pdf)

- **Procurement**: The purchasing of goods or services outside of the University. Conflicts can arise in procurement when a faculty member is in a position to make a purchasing decision that may result in personal or family financial gain.
  - Policy Home and Oversight: Procurement and Contract Services (PaCS)
  - Purchasing forms: [http://pacs.oregonstate.edu/](http://pacs.oregonstate.edu/)
WHY IS COI POLICY AND REPORTING NECESSARY?

The regulation and reporting of conflicts of interest are important because conflicting interests can jeopardize the integrity of the scientific research process and undermine public trust.

Integrity and social responsibility are two of Oregon State University’s five core values. The reporting, identification and management of potential, actual and perceived conflicts of interest ensure that OSU’s contributions to public knowledge through research are done with honesty and integrity.
KEY FACTS: POLICY ON RESEARCH COI

- Maintain the **objectivity of OSU research**

- *Management, reduction or elimination* of potential, actual or perceived **conflicts of interest** in OSU research

- Faculty member reporting of **outside activities** and **significant financial interests**. *Please note: the questions on the reporting form are worded in such a way as to attempt to gather information on outside activities and financial interests that are potentially relevant to the COI policy.*

- Incorporation of two **federal agency COI policies**: PHS’s Objectivity in Research guidelines and NSF’s COI policies

- Administered through the Research Office by the designated **Conflict of Interest Officer**
RESEARCH COI REQUIREMENTS

- **Disclosure**: On an annual basis, disclose financial interests
  - Who must disclose?
    - Professorial faculty, Research Associates, Post-Doctoral Fellows and Scholars
    - Any individual listed by name on a sponsored research project
    - Any other individual requested to disclose by their unit head, dean or the COI Officer

- **Training**: Complete one-time training through online research ethics modules (CITIprogram.org)

- **COI Management**: When a conflict of interest exists, follow the standards set out in a COI management plan.
  - Management generally includes: Disclosure to personnel you oversee and research participants; disclosure in manuscripts and presentations; independent evaluation; restricted outside entity involvement in OSU activities.
COI Disclosure Basics

- **How:** A disclosure form (“declaration”) is available online for any individual with an ONID account

- **Who:** Professorial faculty, Research Associates, Post-Doctoral Fellows and Scholars, and any individual listed by name on a sponsored project. Others can be identified by unit heads, deans, or the COI Officer.

- **What:** Outside activities and financial interests of investigators and members of their family

- **When:** On an annual basis or as outside activities or financial interests are established or change. "Once a disclosure form is completed online, the system will notify faculty members when their annual declaration is near expiration"

- **Where:** Declarations are online at [https://secure.oregonstate.edu/research/coi/](https://secure.oregonstate.edu/research/coi/)
  
  Login requires a University ONID username and password
WHAT HAPPENS AFTER DISCLOSURE?

COI Declaration Process:

- Investigator Submits
- Unit Head Review
- Dean Review (as requested)
- COI Officer Review
- Certification

Additional steps for further review:

- Certification
- Determination of COI existence
- Further information gathering and review

- Includes review and advice from the faculty-based COI Committee
- Management includes: disclosure to research team, disclosure in publications, disclosure in grant proposals, annual review of the COI details, and other techniques
Frequently Asked Questions

- Who has access to the disclosure form?
  The COI disclosure form is considered a confidential personnel record and can be seen by your unit head, dean, the COI Administrator, the COI Committee and the COI Officer.

- Why do the financial interests of members of my family need to be reported?
  Like personal financial gain, family financial gain has the potential to intentionally or unintentionally influence activities at OSU. OSU’s COI policy aligns with federal policies that require the significant financial interests of your family members be included in your reporting and with the State definition of “relative.”

- What if I don’t know all the financial interests of the members of my family?
  Financial interests that you are aware of should be reported per the form questions. You are not expected to disclose the financial interests of your family members if you are unaware of such interests. This exception is included the COI policy definition of “significant financial interest.”

- Do I have to report if I don’t have any conflicting interests?
  All investigators required to complete a COI form on an annual basis must complete the COI declaration even if no conflicts of interest exist between your University research responsibilities and your outside activities.

For more answers to frequently asked questions, please visit the COI webpage on the Research Office website at: http://oregonstate.edu/research/coi/
The COI Compliance Administrator can answer any questions about navigating the online system, completing the declaration form or interpreting the policy.

Any COI Program questions should be addressed to:

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