



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

2022 COI Policy Updates: What You Need to Know

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2022 Revised COI Policy

COI Policy available on COI website

Changes approved by the Audit Committee and the full Board of Trust upon recommendation of the University Conflicts Committee

Changes take effect on March 1, 2022



Substantive Changes



1. Key Changes for Researchers

- Foreign Influence: provides guidance related to foreign support
- Significant Financial Interests: limits the SFI disclosures required

2. Annual Disclosure Requirement Adjustment

3. Gift Limit Increase

4. Clarifications & Defined Terms

- Conflicts are not inherently negative

5. Process Descriptions

- New hire disclosure timeline
- Appeals of adverse conflict decisions

1a. Key Changes for Researchers – Foreign Influence



Examples of foreign support that **must be disclosed by all Investigators on federal grants** (and that may need to be disclosed to other sponsors), include:

- a) all positions and affiliations, including volunteer positions, relevant to an individual's research endeavors
- b) relevant appointments at foreign Institutions – even if labeled as “guest,” “adjunct,” “honorary,” with or without salary support
- c) income, salary, consulting fees, and honoraria in support of an individual's Research endeavors
- d) Participation in a foreign talent or similar-type programs
- e) all resources and other support, both domestic and foreign, for ongoing Research projects, including those conducted at a different Institution
- f) In-kind contributions from domestic and foreign Institutions or governments that support Research activities
- g) travel paid by a foreign Institution or government
- h) Financial Interests received from a foreign Institution of higher education or a foreign government

To review the source of this guidance from PHS, see
<https://grants.nih.gov/policy/protecting-innovation.htm>

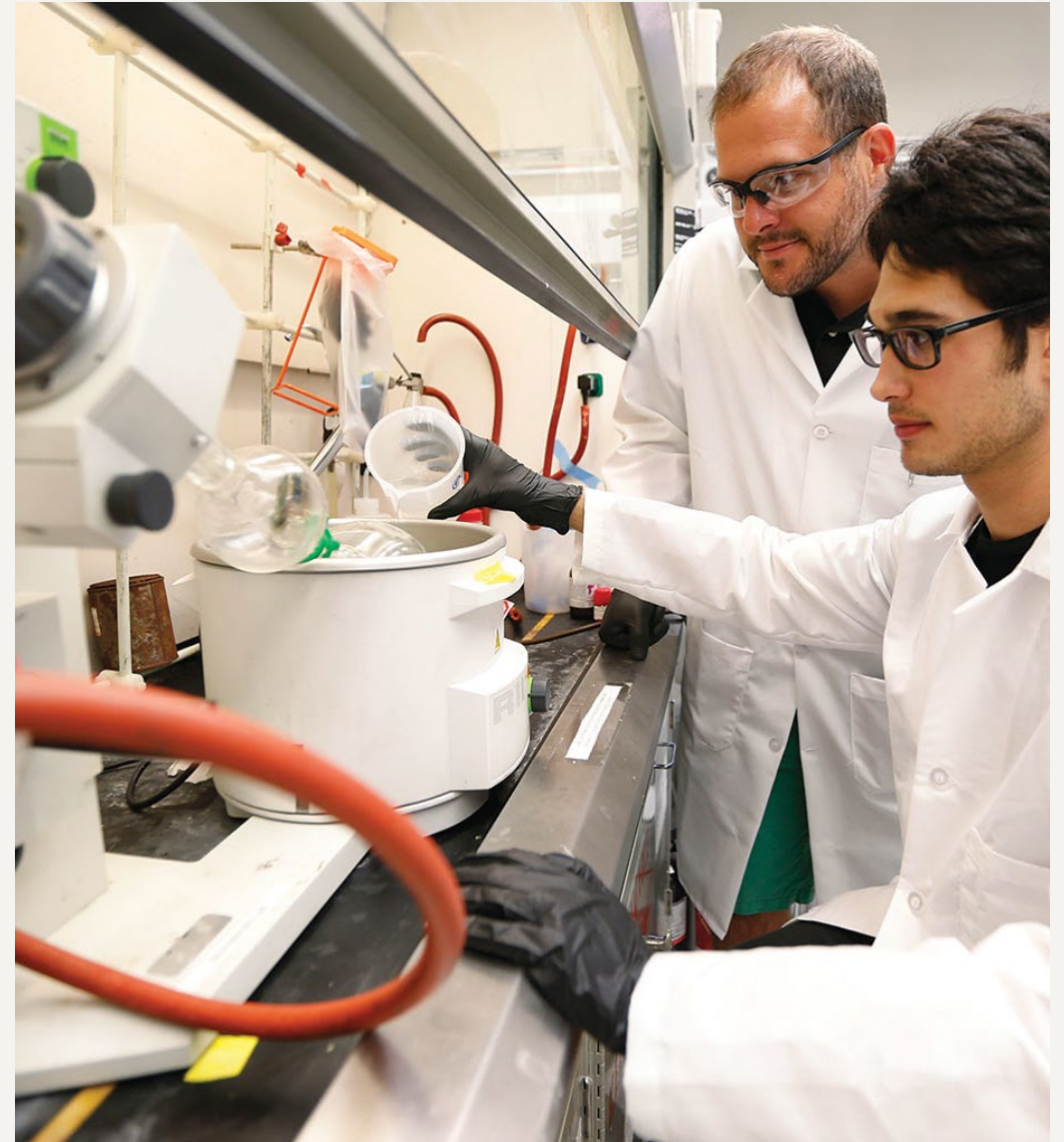
Substantive Changes

1b. Key Changes for Researchers – Significant Financial Interests

In addition to their own interests, Investigators must disclose the significant financial interests of their ***spouse and dependent children***

Investigators are no longer required to disclose financial interests of ***all family members***

This change was made to align the Vanderbilt policy with PHS policy



2. Annual Disclosure Requirement Adjustment



2022 Revised COI Policy gives the University Conflicts Committee (UCC) the authority to exempt certain low-risk populations from the annual disclosure requirement upon recommendation by the COI Office

The COI Office will make recommendations to exempt certain groups periodically

Disclosure requirements will continue for all staff, but some staff may not be required to disclose *every* year

Annual disclosure requirements continue for active faculty members, although some emeritus faculty members may be exempted from the requirement

Substantive Changes

3. Gift Limit Increase

Gift limit increased from \$300 to \$400 per year

No gifts should be accepted from any source if acceptance of such gifts could place an individual in a compromising position

No gifts may be accepted from the healthcare industry

4. Clarifications – Negative Connotation of Conflicts & Other Clarifications



Negative Connotation of Conflicts

- The 2022 Revised COI Policy clarifies that conflicts of interest are not inherently negative
- Faculty Senate suggested clarification: many activities that must be disclosed are crucial to the University's mission
- Identifying and managing these conflicts is necessary, but the disclosure requirement should not be viewed to imply any wrongdoing

Other Clarifications:

- Capitalizes all defined terms
- Notes at the beginning of policy that there is glossary of defined terms at the end of the policy
- Changes term "Members of the University Community" to "Covered Individuals"
- Defines "Covered Individuals" in the glossary
- Defines "Entity" and "Institution" in the glossary
- Clarifies that Emeritus Trustees are exempt from disclosure requirements
- Updates contact information and makes clarifications related to VUMC employed faculty

5. Process Descriptions

Addition of 60-day grace period on disclosure requirements for newly hired faculty and staff

- Newly hired faculty and staff must complete a disclosure upon hire or appointment, but because that is not always possible to complete immediately, the 60-day grace period applies

Description of appeal process for certain conflict appeals

- It remains the case that any affected faculty or staff member can appeal an adverse decision (e.g. a finding that a conflict is not manageable), but the 2022 Revised COI Policy now describes *how* to request an appeal

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>