



VANDERBILT UNIVERSITY
Office of the General Counsel

COI 101: Training for Faculty, Staff, and Postdocs

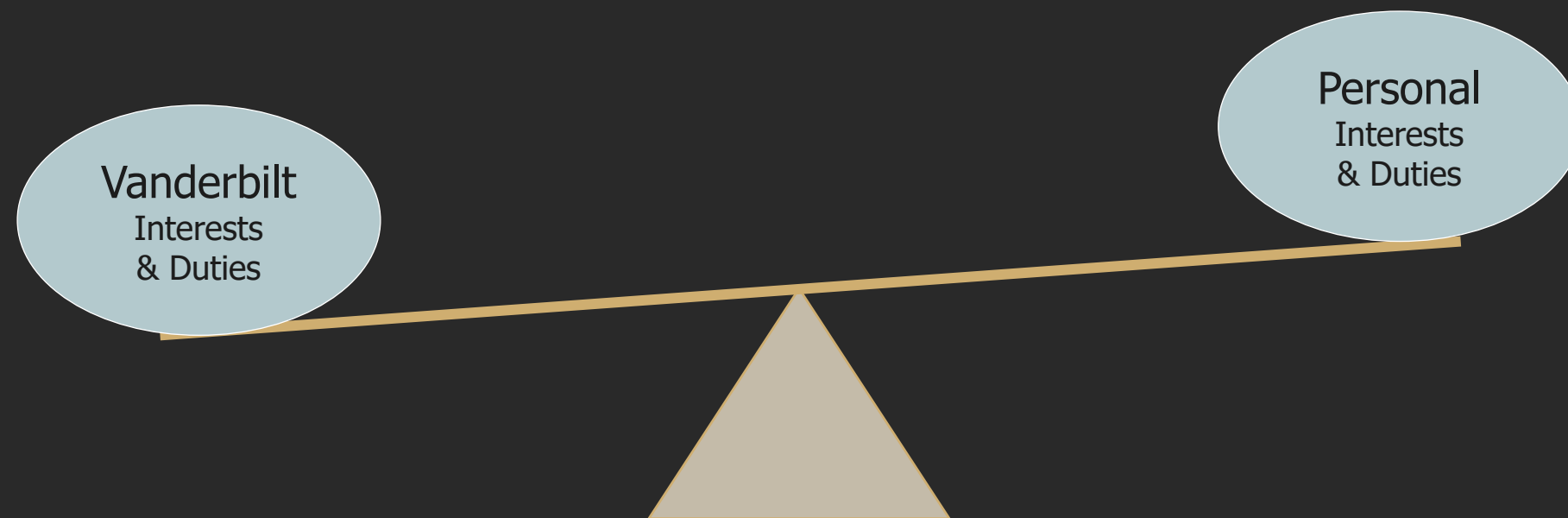
Spruell Driver, Director

Alison Cooper, Associate Director

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What is a COI?

- Individual conflicts of interest refer to situations in which an individual's or family member's **financial, professional, or other personal considerations** may directly or indirectly affect, or have the appearance of affecting, an individual's professional judgment in exercising any university duty or responsibility, including the design, conduct, or reporting of research.
- A COI may occur any time an individual's interests outside Vanderbilt may interact in any way with the individual's role at Vanderbilt.
- Common examples include financial interests, family members, and extra jobs.



Why is this policy important?

Public Trust & Confidence

- The policy helps protect the trust and confidence that the public has in Vanderbilt as an academic center and research institution.

Individual & Institutional Reputations

- Without the policy, individual and institutional reputations could be harmed.

Sponsored Research Requirements

- Many research sponsors require it in their contracts or grant terms and conditions.

Protecting Individuals & Vanderbilt

- The policy serves to protect BOTH the University's interests and the interests of the faculty and staff who are disclosing.

Creating a Conflict Disclosure

Who?

All VU Faculty, Staff, and Postdocs

When?

Every year and ALSO when your circumstances change (within 30 days of a new significant financial interest)

Where?

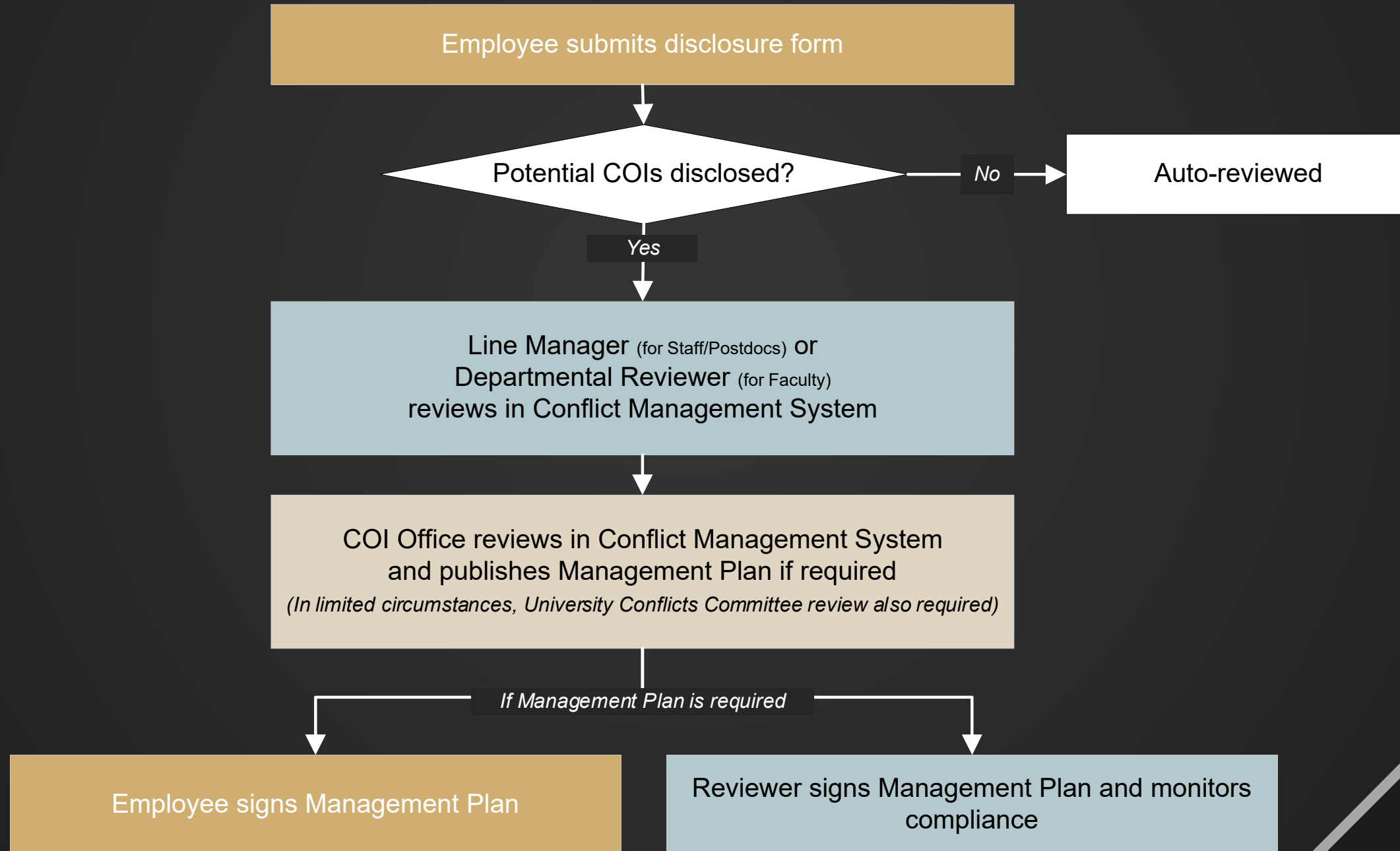
Conflict Disclosure System

How?

Log-in with your VUNetID & password

Review of COI Disclosures:

What happens when you submit a disclosure?



Management Plans

Plans are put into place to limit the risks to the University and the faculty/staff member with the conflict. Some plans also protect the integrity of research.

Having a “conflict” does not necessarily mean an activity is prohibited. In most cases, all that is needed is a management plan.

Initial oversight of all management plans remains a duty of the reviewer.

Questions about implementation of a management plan may be brought to the COI Office at any time.

Important COI/COC Topics

**Personal Interests
in Vanderbilt
Activities**

**Business
Relationships with
Vanderbilt**

**Gifts and
Contributions**

University Assets

Student Activities

Family Members

**Conflict of
Commitment**

Research Activities

Important COI/COI Topics

1. PERSONAL INTERESTS IN VU ACTIVITIES

- Avoid decisions on behalf of the University when you have a personal interest or APPEARANCE of a personal interest in:
 - Hiring
 - Purchasing
 - Contracting/Consulting

2. BUSINESS RELATIONSHIPS WITH VU

- Avoid situations where you or a family member has a Business Relationship with VU.



Important COI/COC Topics

3. GIFTS AND CONTRIBUTIONS

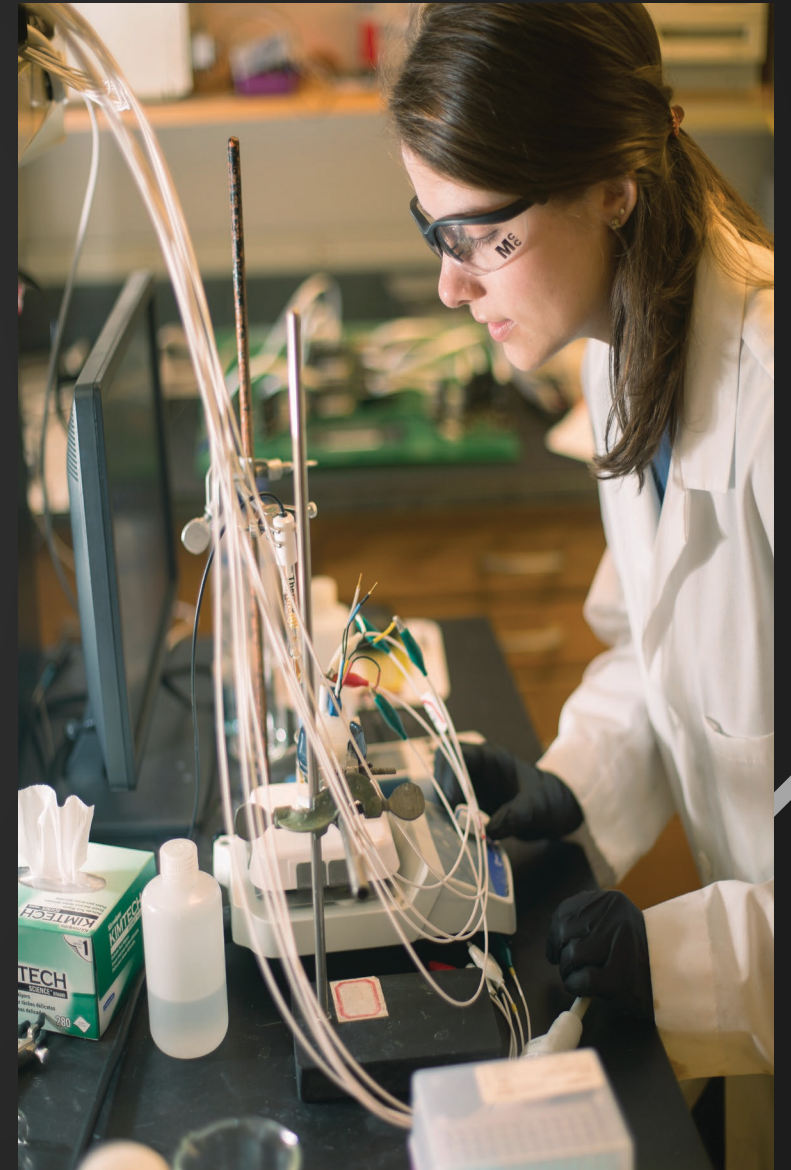
- **NO** gifts or accommodations may be accepted by the University or individual members of the University if this puts them in a **prejudicial** or **compromising** position.
- Gifts in support of the institutional mission must be directed through the Development Offices.
- **Gift Limits:**

Non-Healthcare Industry	Healthcare Industry
You may accept gifts, meals, entertainment, etc. no greater than \$400/year/vendor.	You may accept NO gifts of any value (\$0).

Important COI/COC Topics

4. USE OF UNIVERSITY ASSETS

- University Assets include buildings, personnel, equipment, patents, technology, and (perhaps most importantly) the University's reputation.
- Misappropriation or unauthorized use of University assets in connection with external activities not allowed.
- Protection of the University's reputation means that even implied endorsements of other businesses or entities are prohibited.



Important COI/COC Topics

5. STUDENT ACTIVITIES

- Unless an approved management plan is in place, students, postdocs, or other trainees should not be assigned to University projects sponsored by a business **if** the supervising faculty member or the faculty member's family member has a significant financial interest in the business.

6. ACTIVITIES WITH FAMILY MEMBERS

- University employees **may not** participate in the hiring process or employment-related decisions regarding their family members.
- University employees **may not** be in a position to supervise a family member or review a family member's work.

Important COI/COC Topics

7. CONFLICT OF COMMITMENT

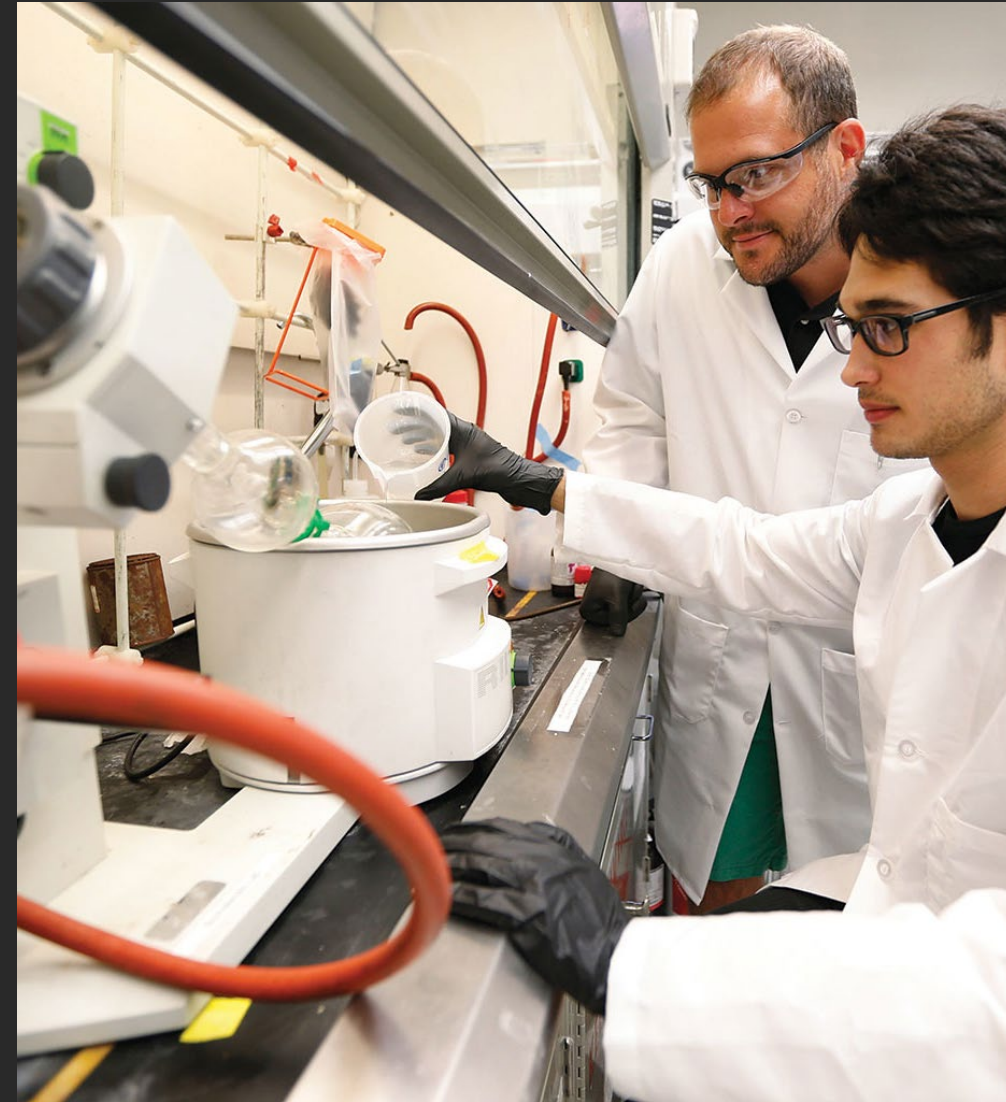
- Conflict of Commitment is the distribution of effort between University employment or faculty appointment and commitment to external activities.
- Staff do not have allotted consulting days and are required to take vacation days for any outside activities/commitments.
- Faculty members have allotted consulting days based on their appointment type.
- **Consulting Days Threshold:**

Staff	Faculty: 9-Month Appointment	Faculty: 12-Month Appointment
0 days per year	40 days per year	50 days per year

Important COI/COC Topics

8. RESEARCH ACTIVITIES

- Conflicts of Interest in Research are situations in which financial, professional, or personal considerations may compromise (or may appear to compromise) an investigator's judgment in design, conduct, or reporting of research.
- You should **not** be involved in the review, approval, or control of research if you or a family member has a **SIGNIFICANT FINANCIAL INTEREST** (unless a COI management plan has been put in place to protect the integrity of the research).
- This is especially important if you are doing Human Subjects Research, as no research will receive final approval until the conflict of interest is addressed.
- NSF, PHS, and FDA have specific guidelines regarding conflicts of interest.



What constitutes a significant financial interest (SFIs)?

- An SFI is a financial interest that is **related to** your institutional responsibilities, or your scholarly field of work at the University.
- The general idea is that this is a financial interest which could be *perceived* as related to your field of work such that it might create the appearance of bias.
- The chart below explains what qualifies as an SFI:

Income/ Compensation	Equity	Travel
≥\$5000 per year in payments is an SFI	<ul style="list-style-type: none">• Non-Publicly Traded Company: Any equity is an automatic SFI.• Publicly Traded Company: ≥\$5000 in equity value is an SFI (or aggregate of ≥\$5000 in combined annual income and equity).	Travel may also be an SFI, so all travel that is paid by third parties (not VU) and is related to your institutional responsibilities must be reported (<u>for PHS-funded faculty/staff only</u>).

PHS-Funded Research (or research from a funding source that follows PHS regulation)

Significant Financial Interests

- PHS regulations require disclosure of all **Significant Financial Interests (SFIs)**.
- The definition of SFIs used throughout the Vanderbilt University Conflict of Interest and Commitment Policy is derived directly from PHS regulations.

Travel

- PHS-funded faculty and staff are required to disclose travel reimbursed or paid and not funded through Vanderbilt University.

Investigator Training

- [Financial Conflict of Interest \(FCOI\) training](#) is required for Investigators before engaging in PHS-funded research, and immediately under designated circumstances. The training link and training certification is also on the Acknowledgements Page of your conflict disclosure form.
- Many funding sources follow the PHS regulations. For more information about the regulation, please visit: <https://grants.nih.gov/grants/policy/coi/index.htm>

Office of Conflicts of Interest and Commitment Management

The **Office of Conflicts 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

Spruell Driver, Director

spruell.driver@vanderbilt.edu

(615)875-8064

Alison Cooper, Associate Director

alison.r.cooper@vanderbilt.edu

615-322-8363

Visit our website for additional resources:

www.vanderbilt.edu/generalcounsel/compliance/coi