

DDPSC Research Financial Conflict of Interest Quick Reference Guide

The Research Financial Conflict Of Interest (COI) Policy and process changes that will be fully implemented on August 24, 2012, are attached. The following outlines some of the key changes.

DISCLOSURE

Individuals will not need to resubmit a Financial Disclosure Statement due to the changes in the policy and processes until their current disclosure is up for renewal or their financial interests have changed.

Who: The population of individuals (“covered individuals”) required to disclose has been expanded. The following individuals will be required to disclose:

- **Individuals, who by definition, have independent responsibility** for the design, conduct, or reporting of research at DDPSC: Principal Investigator (PI)/Project Director (PD), Co-Investigator, Key Personnel, Fellows on individual fellowship grants;
- **Any other individual**, who regardless of title or position, has or may have independent responsibility for the design, conduct, or reporting of the research. The PI/PD is responsible for making the determination of who meets this definition, which may include: Collaborators/consultants, Research/Staff Scientists, Trainees/Students, and Individuals who do not have an appointment at DDPSC, but have the above role/designation related to research being conducted at DDPSC.

What: The following outlines the financial interests that must be disclosed:

- Covered individuals must disclose all personal financial relationships related to their institutional responsibilities (not just those related to their research activities, as previously required);
- A \$0.00 threshold for disclosure will continue to be used uniformly for all individuals (as previously required) with the following exceptions: a) aggregate equity interests held in publicly traded entities; b) aggregated salaries, royalties and other payments over the twelve month period; and c) sponsored or reimbursed travel in which a \$5,000.00 threshold shall be used (**new**);
- Covered individuals must disclose travel paid for or reimbursed by an outside entity (**new**). Elements required to be disclosed are:
 - The dates of travel
 - Destination
 - Entity that paid for the travel
 - Purpose of the trip
 - Was travel paid for your spouse and/or dependent child(ren) by the entity?

When: Covered individuals must update their Financial Disclosure Statement:

- at least annually;
- within 30 days of acquiring a new financial interest (which includes travel);
- when applying for a new research project; or
- when they initiate new research projects.

How: The following disclosure method will be utilized:

- The disclosures will be made using the Financial Disclosure Form attached to the Research Conflict of Interest Policy and shall be made directly to HR or the POC.
- Upon completion of travel not sponsored or reimbursed by a government agency, an institute of higher education (or affiliated research institute), or an academic teaching hospital, the Travel Disclosure Form maintained on the DDPSC intranet shall be completed by the Investigator and submitted directly to HR or the POC (**new**).

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REVIEW OF FINANCIAL INTERESTS

- The RIO and POC will continue to review all financial disclosures to 1) assess whether a financial interest is related to an individual's research activities and then 2) determine if a financial conflict of interest exists.
- The threshold for review of financial interests and management of any financial conflicts of interest will not be specific to the source of research funding. For all research funded the disclosure thresholds (as established by the DDPSC Research FCOI Policy) will be used for review.

MANAGEMENT OF FINANCIAL CONFLICTS OF INTEREST

- The standards/guidelines for managing financial conflicts of interests have been revised and include additional information about what is considered when identifying and managing financial conflicts of interest.
- All potential conflicts of interest will continue to be presented to the Conflict of Interest Subcommittee with the corresponding management plan annually and shall refer matters to the Compensation Committee as indicated in the Research FCOI Policy.

MONITORING

- For all funded individuals, adherence to the Research Financial COI Policy and processes will be monitored for compliance (as required by federal regulations).

EDUCATION

- All individuals who complete a disclosure statement must complete COI education within the next 12 months or prior to the start date of any new, competitive, or non-competitive awards supporting research activities, whichever occurs first.
- Renewal of the education will be required every four years.
- The in-person training is available three times annually.

PUBLIC ACCESSIBILITY

- The Center shall post the Research Financial COI Policy on its website and shall make all other information available upon written request.

CONTACTS

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