



# Policy Brief

Last Revised: 7/25/2024

## 7.24 Research Institutional Conflicts of Interest

**Administering Department:** Research Compliance & Regulatory Affairs

### Scope:

#### Summary

The purpose of this policy is to safeguard the objectivity, integrity, and credibility of Research by ensuring that the financial interests of Emory or its Institutional Leaders do not affect the design, conduct, reporting, review, or oversight of Research. This policy defines the standards and procedures that Emory University follows to identify and manage or eliminate Research Institutional Conflicts of Interest.

#### Applicability

- This policy applies to Emory University as an Institution and Institutional Leaders who have the capacity to affect, or could reasonably appear to affect, University processes for the design, conduct, reporting, review, or oversight of Research due to their position with the University.
- This policy does not limit Institutional Leaders' obligations for disclosure and/or management of other financial interests by Institutional Leaders that are required by other Emory policies or procedures.

### How to Comply with the Policy

- 1. Identify Institutional Significant Financial Interests ("Institutional SFI") Related to Research**
  - a. The Research COI/COC Office will identify ICOIs via:
    - i. Disclosures from Institutional Leaders
    - ii. Communication between units
    - iii. Other reports made regarding ICOIs
  - b. The Research COI/COC Office will evaluate Institutional SFIs and their relatedness to Research for reporting to the Research ICOI Official/VPRA or designee.
- 2. Determine if an Institutional SFI creates a Research Institutional Conflict of Interest ("Research ICOI")**
  - a. The Research ICOI Official/VPRA or designee will call on an ad hoc Research ICOI Committee to review the Institutional SFI Related to Research and confirm whether a Research ICOI exists
  - b. If a Research ICOI exists, the Research ICOI Committee will evaluate the Research ICOI per criteria described in the Research ICOI Committee Charter to determine management.
- 3. Manage or Eliminate Research ICOIs.**
  - a. The research ICOI committee will permit the research to proceed at Emory either:



- i. subject to elimination of the research ICOI (e.g. divestment of the Institutional SFI), or
  - ii. subject to a plan for managing the Research ICOI.
- b. Research COI/COC Office will assist the Research ICOI Committee in monitoring compliance with the Management Plan and request reports periodically, as needed, and annually.

### Noncompliance with the Policy

- Possible violations of this policy include, but are not limited to, failure to report an Institutional SFI, providing false, misleading, or incomplete information, and failure to cooperate in the Management Plan of a Research ICOI.
- Noncompliance will be reported to supervisor or unit leadership for disciplinary action, up to and including dismissal.