

Research Compliance and Regulatory Affairs Office Spotlight:

Conflict of Interest & Conflict of Commitment



The Team!

- Nicole Tannebaum, Director
- Sefilat Ajishafe, Assistant Director
- Jelve Gozly, Senior COI Specialist
- Adrienne Brutscher, Program Specialist



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Pop Quiz: Conflict or No Conflict?

1. Conducting research at Emory sponsored by Merck while providing consulting services to Merck



Pop Quiz: Conflict or No Conflict?

2. Launching a start-up company and serving as CEO



Pop Quiz: Conflict or No Conflict?

3. Coaching your child's high school soccer team



Pop Quiz: Conflict or No Conflict?

4. Owning a company that sells technology you study in your research



Mission: Ensure Research Objectivity



Design, conduct, and reporting of research must be objective



Multifaceted relationships between Emory Investigators and industry exist and often complement research



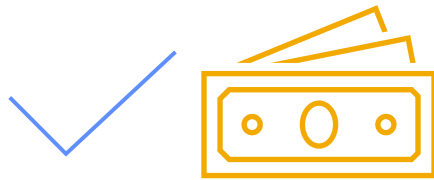
Must follow federal rules as stewards of federal money



Primary commitment of time and intellectual energy owed to Emory by employees



What is a Financial Conflict of Interest?



Determination that an individual's financial interest could significantly alter the design, conduct, or reporting of research



Official University Policy
<https://emory.ellucid.com>

Policy 7.7

Policy for Investigators Holding a Financial Interest in Research

Responsible Official: VP for Research Administration

Administering Division/Department: Research Compliance

Effective Date: August 24, 2012

Last Revision Date: March 20, 2017

Policy Sections:

- I. [Overview](#)
- II. [Applicability](#)
- III. [Policy Details](#)
- IV. [Definitions](#)
- V. [Related Links](#)
- VI. [Contact Information](#)
- VII. [Revision History](#)

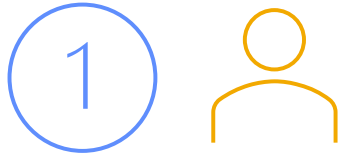


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Policy 7.7 Requirements



Who:

Investigators & Key Personnel



What:

Disclose Significant Financial Interests



When: Within 30 days of hire, within 30 days of receiving new SFI, annually, with sponsored awards



Where:

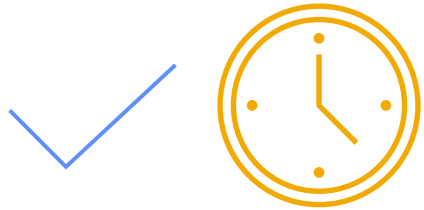
Emory's electronic disclosure system

Disclosures reviewed by COI Office & COI Committee

FCOIs must be managed or eliminated



What is a Conflict of Commitment?



Determination that an individual's intellectual energy, time, or effort to external activities interferes with Emory responsibilities

13.3 Conflict of Commitment

Guiding Principle: Emory faculty owe their primary professional allegiance to the university; their primary commitment of time and intellectual energies is to the education, research, and other programs supporting the university's mission. The specific responsibilities and professional activities that constitute an appropriate and primary commitment will differ across schools, but they should be based on a general understanding between the faculty member, department chair (if applicable), and dean.

13.3.A POLICY REGARDING TEACHING, RESEARCH, AND OTHER SERVICE OUTSIDE THE FACULTY MEMBER'S SCHOOL AT EMORY OR OTHER INSTITUTIONS (FULL POLICY)



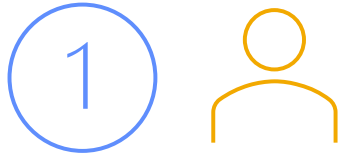
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Policy 13.3.A & 7.3 Requirements

Policies in final stages of review.
No changes anticipated.



Who:

Faculty, Postdoctoral Fellows
or Trainees, Research Staff



What:

Seek approval for paid or unpaid external
research, teaching, service, other professional
activities from academic unit



When:

Prior to the start of the
activity



Where:

Emory's electronic disclosure
system



Action Required

Request Pre-Approval

☒ Complete Disclosure Profile Update

Disclosure Profile for Nicole Tannebaum

Instruction Center

Action Required

Review disclosure information in the disclosure profile. When all disclosure information is current and accurate, click on the Complete Disclosure Profile Update button.

Reason

The disclosure profile is new and has never been completed

Edit Disclosure Profile

Disclosures

History

Filter by ?

Activity

Enter text to search



+ Add Filter

✕ Clear All



Activity

Author

Activity Date



eDisclose Benefits

Improved User Experience

- Skip logic eliminates irrelevant questions
- Faster system speed
- Future integration with eIRB
- Easy to amend help text and instructions (we can be responsive to community needs)
- User-friendly interface
- Ability to save information and return later to submit

Reduce Inefficiencies

- Eliminates redundant disclosure forms
- Reviewers only receive disclosures that meet defined thresholds
- Streamlined workflow for COI staff & other users (faster processing time)
- PFIRR process amended to reduce administrative burden (no need to submit new disclosure at proposal stage if active COI disclosure on file)
- No re-entry of data needed

Compliance with New U.S. Government Regulatory Requirements

- Enables expanded questions about external activities & foreign engagement
- New DOE COI certification language embedded
- Enables required activity tracking and reporting
- Easy to create reports to share information (e.g., Report for OSP to verify that Biosketch/Other Support documents matches disclosure)

