



THE UNIVERSITY
of NORTH CAROLINA
at CHAPEL HILL

Conflict of Interest One Year Later ...and Learning

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Sub-Contracts

- Letter of intent should specify whose policy they will use
 - Need disclosures at the time of application
- Contract should contain specific provisions
 - Confirmation of personnel list
- Monitoring continued compliance
 - For those with own policy, consider a reminder
 - For those who fall under your policy, if new staff are added to project who meet the definition of investigator, then invoice should not be paid until training and disclosure are completed.



Collaborators and Consultants

- Compliance with having disclosures completed at the time of application
- Different policy coverage for COI: some institutions may cover their employees for consulting, others may not
- If individual not covered by their own organization, then must fall under University policy.

NOTE: At UNC-CH we extend this review to all research, regardless of source of funding.



Collaborators and Consultants (our CH employees)

Situations where our CH faculty are collaborators or consultants on other institutions' grants. Three potential scenarios:

- EPAP
- Sub-Award
- Secondary Duty (non-compensated)



NIH Pro-Active Compliance Reviews

NIH is reviewing various institutions' on-line policies. Following are a few that have been mentioned to CH. NIH will publish a full list at some point in the future:

- Travel should include the 12 month look back
- Public Accessibility should state records available for 3 years
- Annual Reports section should detail this information is due at the time of the progress report IE 60 days prior to renewal
- Policy should include all possible reasons for Corrective Action plans with prompt reporting to NIH



Nuggets from the National AAMC FOCI Meeting

A multitude of issues covered, mostly related to AMCs, the Physician Sunshine Act, clinical conflicts. Topics related to UNC System Universities:

- Internal coordination with IRB, Tech Transfer, Sponsored Programs, others
- SBIR and STTR concerns
- Student involvement in research with licensed IP
- Institutional COI



Summary Thoughts

- Implementation is on-going as new situations arise which challenge the established processes.
- Perception that NIH “grace period” is ending soon.
- BOG definition of COI extends beyond federal.....and so must our review



What is a COI?

Conflict of interest is a situation in which financial or other personal considerations:

- may compromise,
- may involve the potential for compromising, or
- may have the appearance of compromising

an employee's objectivity in meeting University duties or responsibilities, including research activities.

UNC Board of Governors Policy Manual



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