

# Conflict of Interest: Who Decides and How?

NCURA

Western and Rocky Mountain

Regional Meeting

Park City, Utah

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Jean Wylie

Compliance Director for Conflicts of Interest/Commitment

University of Colorado at Boulder

**The University of Utah**

# Research Administration Training Series

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Research Education  
Office of the Vice President for Research

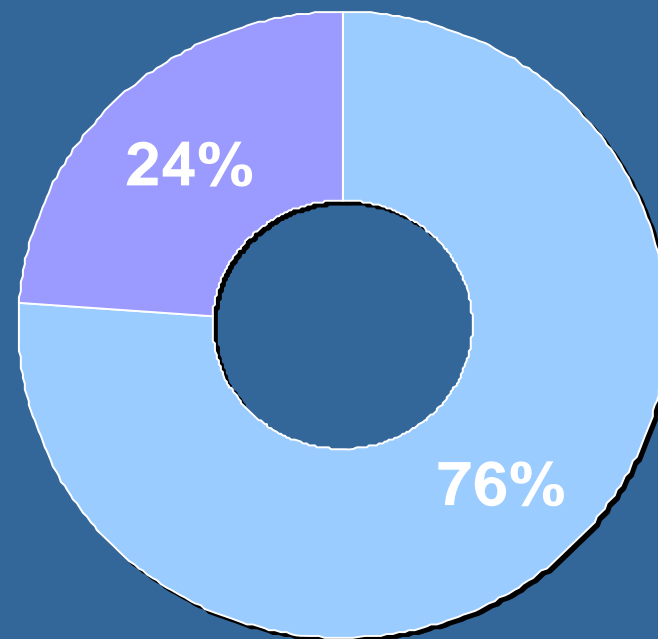


# Meet Your Colleagues



# Please indicate your gender:

1. Female
2. Male



Female Male

# Where are you from?

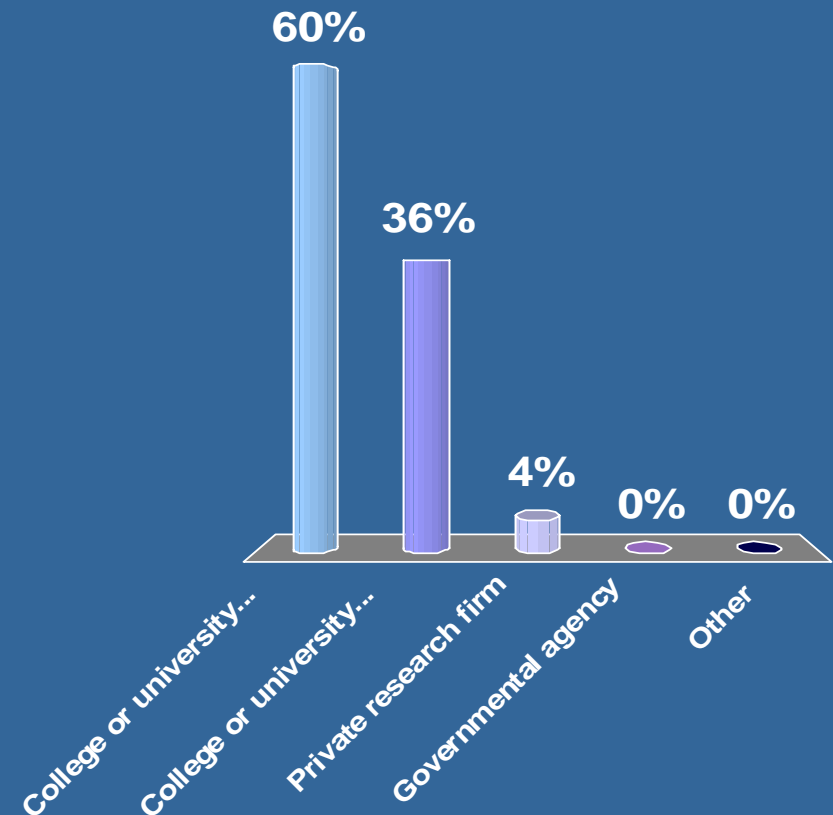


- |     |    |                                   |
|-----|----|-----------------------------------|
| 68% | 1. | NCURA Region VI - Western         |
| 28% | 2. | NCURA Region VII - Rocky Mountain |
| 4%  | 3. | Other NCURA Region                |
| 0%  | 4. | Outside United States             |

# What type of organization do you represent?

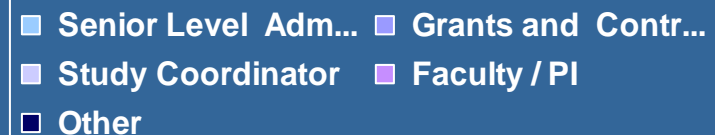
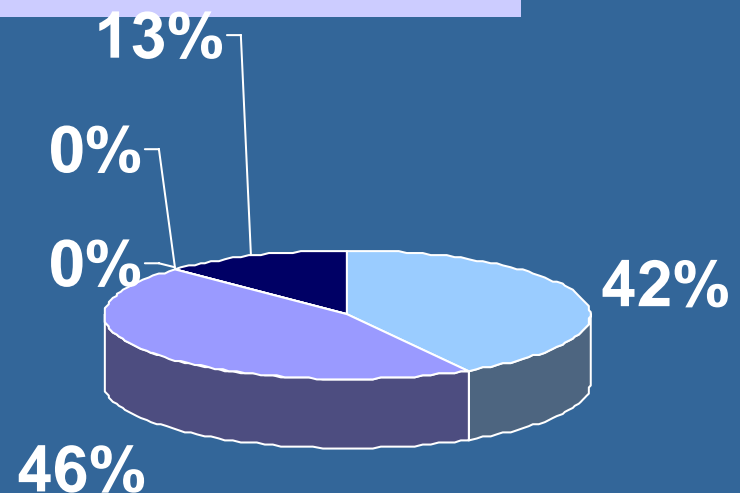


1. College or university with a medical school
2. College or university without a medical school
3. Private research firm
4. Governmental agency
5. Other



# What type of position do you have:

1. Senior Level Administration
2. Grants and Contracts Officer
3. Study Coordinator
4. Faculty / PI
5. Other



# How long have you worked in your current position?



# Purpose of CoI Policies & Procedures:

- Identify potential conflicts of interest and manage them to the satisfaction of our funders
- Provide protection to the institution and to the disclosers from allegations of misconduct
- Provide protection to human subjects from inappropriate conduct of research
- Protect students and other subordinates from inappropriate use of their time and energy

# Conflict of Interest Compliance

- Identify\*
- Manage, Reduce, Eliminate
- Notify

# Mechanisms for Identifying Conflicts:

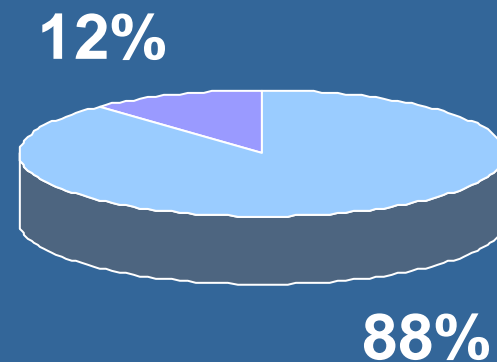
- **Event-based**: some University activity requires the employee to disclose information relevant to potential conflicts of interest
- **Annual**: employees disclose information relevant to potential conflicts of interest on an annual form
- **When a conflict is identified**: the person with a potential conflict discloses to someone in authority when the discloser thinks s/he has a conflict

# Who decides when disclosure takes place?

- Annual: institution
- Event-based: institution
- When conflict identified: individual\*

# Do you know what kind of CoI identification process your institution uses?

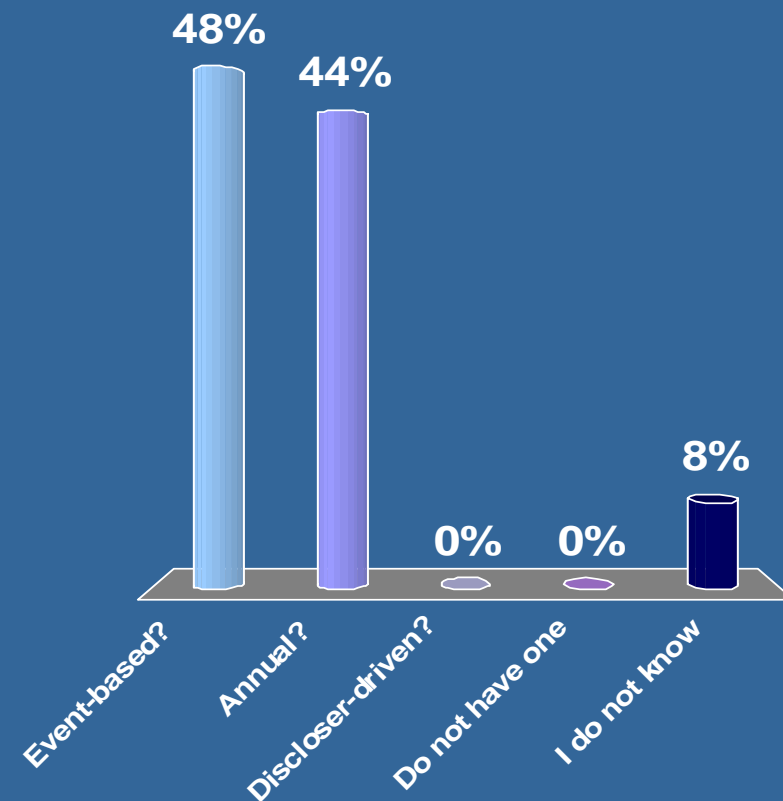
1. Yes, I do know
2. No, I do not know



■ Yes, I do know ■ No, I do not know

# Is your institution's CoI identification...

1. Event-based?
2. Annual?
3. Discloser-driven?
4. Do not have one
5. I do not know



# Which is the “best” way to identify potential conflicts of interest?

- What is the “ideal” conflict of interest system?
- What should it do (or not do)?

## Characteristics of an “ideal” system:

- Identify every possible conflict
- Require minimal paperwork/user friendly
- Be timely - not interfere with submissions/funding
- Get all the information needed
- Be well-coordinated with all research compliance offices (IRB, OSP, IACUC, etc.)
- Other? What do you think should be included?

# Event-based: Advantages and Disadvantages

## Advantages

- only folks with events do
- accepted readily
- easy to track to event
- easy to coordinate
- all that is required by funders
- other?

## Disadvantages

- risk of missing potential conflicts
- difficult to get all required
- greater risk to institution
- other?

# Annual:

## Advantages and Disadvantages

### Advantages

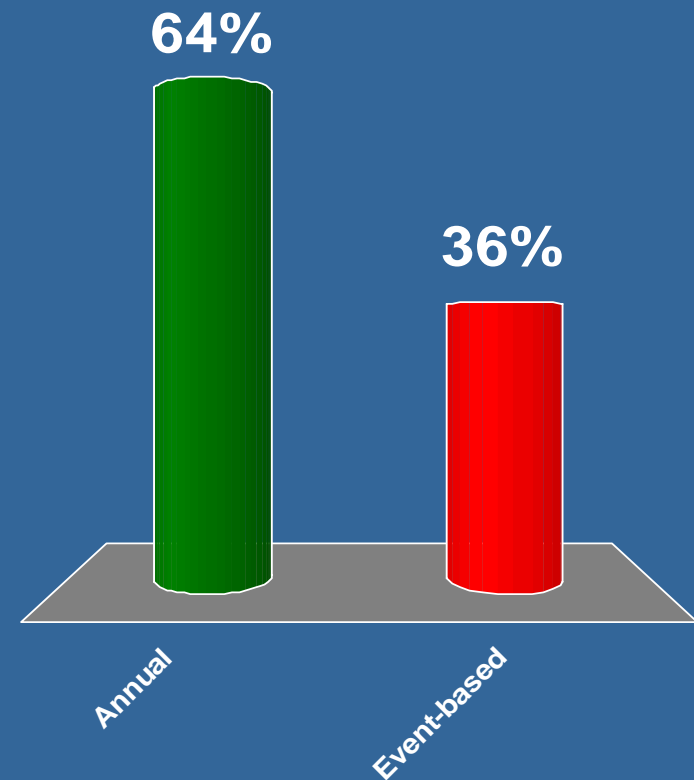
- ID all potential conflicts
- everyone has one on file at any time
- most protection for the institution
- other?

### Disadvantages

- ID non-conflict situations
- has to be updated every year
- even non-conflicted must submit
- have to relate to events somehow
- other?

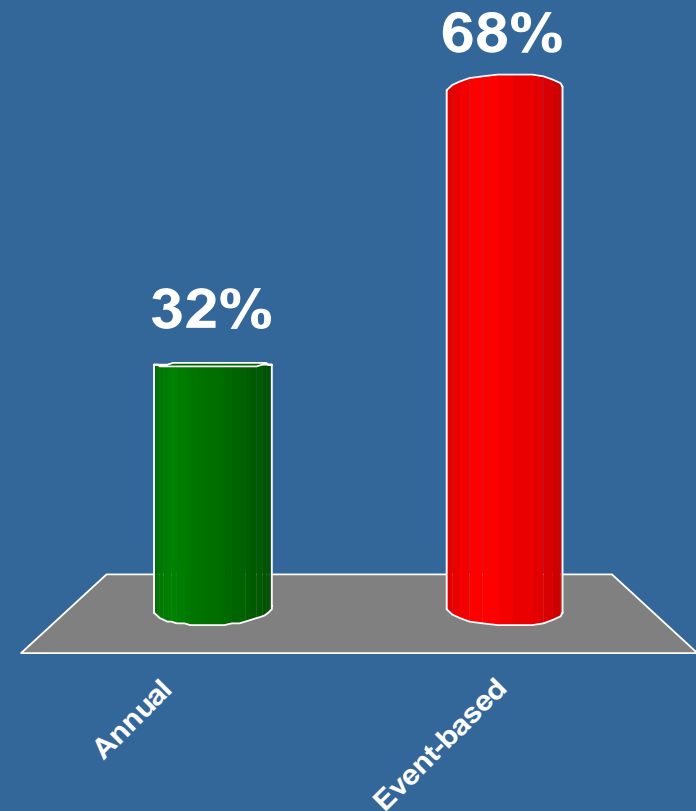
# What is the “Ideal System” for: Identifying Every Possible Conflict

1. Annual
2. Event-based



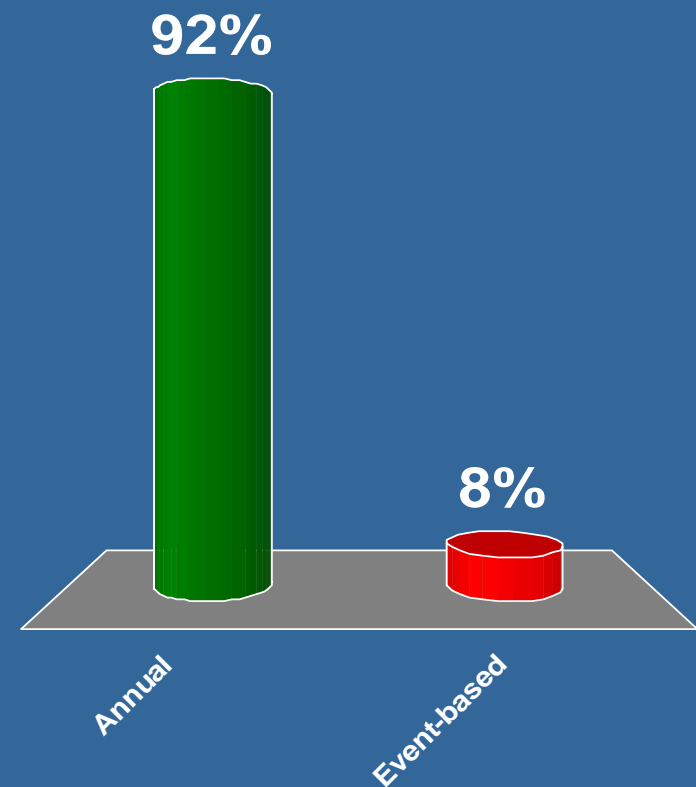
# What is the “Ideal System” to: Minimize “paperwork” / user friendly

1. Annual
2. Event-based



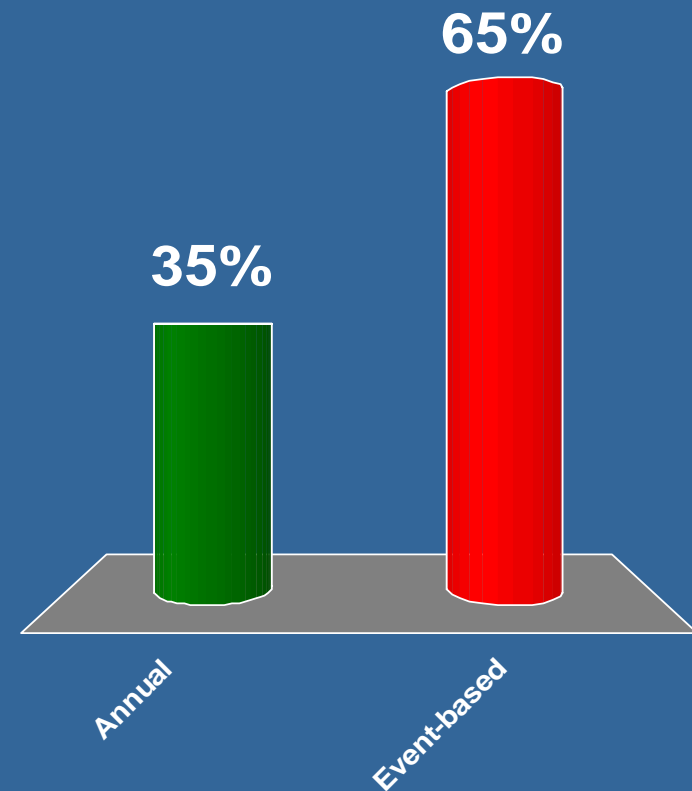
# What is the “Ideal System” for being: Timely - not interfere with submissions/funding

1. Annual
2. Event-based



# What is the “Ideal System” to: Get all information needed to identify a conflict

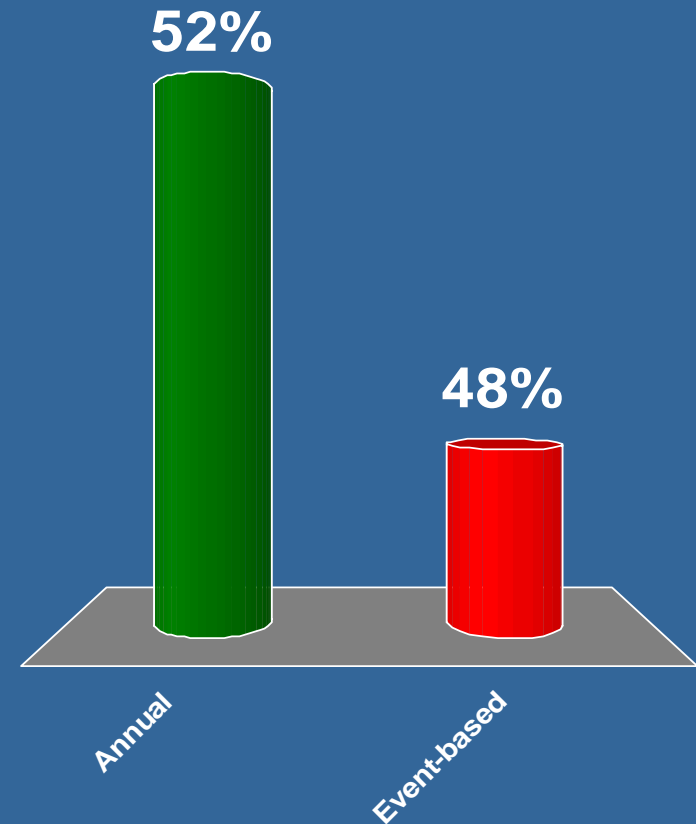
1. Annual
2. Event-based



What is the “Ideal System” to be:

**Well coordinated with other compliance offices**

1. Annual
2. Event-based



# What is the “Ideal System” for:

## Other Considerations

1. Annual
2. Event-based

# What did we decide is the “Ideal System”?

- Identify every possible conflict
- Minimize “paperwork” / user-friendly
- Timely – not interfere with submissions / funding
- Get all necessary information
- Well coordinated with other compliance offices
- Other considerations

## Reality: Which are Most Important?

- Identify every possible conflict
- Minimize “paperwork” / user friendly
- Be timely – not interfere with submissions / funding
- Get all the information needed
- Be well-coordinated with all research compliance offices (IRB, OSP, IACUC, etc.)
- Other considerations

Please select the following items **in rank order** from Most Important to Least Important

- 232** 1. Identify every possible conflict
- 181** 2. Minimal “paperwork”/ user-friendly
- 219** 3. Timely - not interfere with submissions / funding
- 242** 4. Get all necessary information
- 179** 5. Well coordinated with other compliance offices
- 122** 6. Other considerations

# Summary

	<u>Annual</u>	<u>Event-based</u>
● Identify every possible conflict	X	
● Minimize “paperwork”		X
● Timely – not interfere	X	
● Get all necessary information		X
● Well coordinated with offices	X	
● Other considerations	<i>(was not determined)</i>	

## So ... which system is right for your institution?

There is no one “right” answer – institution specific.

Consider the strengths and limitations of each identification system, then evaluate your institution’s needs, resources, values, etc.

Be flexible!

# Training and Educational Outreach



# Goals and Objectives

- to educate faculty and staff about University Conflict of Interest policies
- to support and maintain policy compliance
- to develop a standardized body of knowledge for all members of the research community



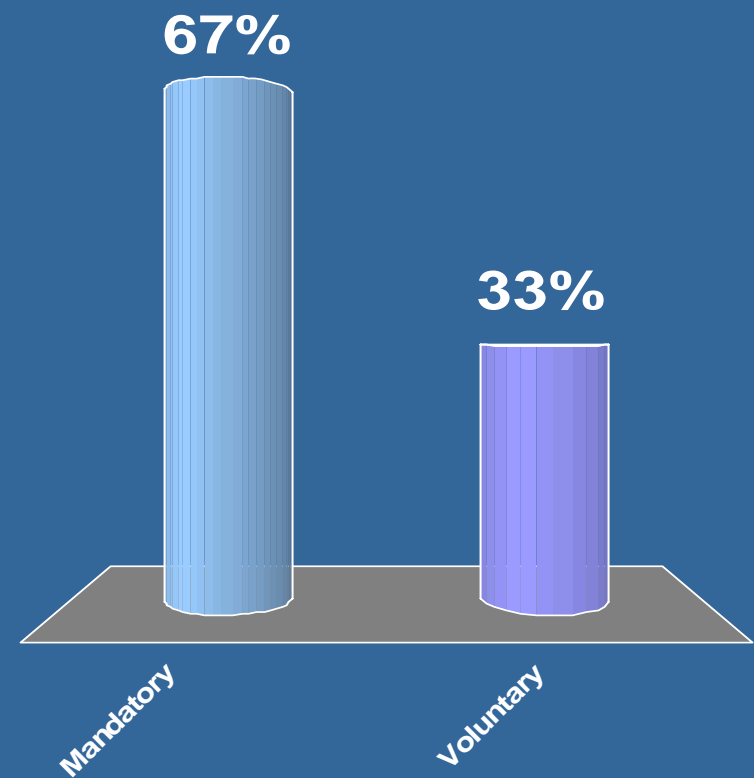
## Discussion Item:

# Mandatory or Voluntary Participation

- Implementation and Enforcement Strategy
- Duty of Care and Responsibility
- Subject Matter Expert (SME) Recruitment
- Hiring Decisions / Conditions of Employment
- Compensation Issues
- Documentation, Records and Statistics

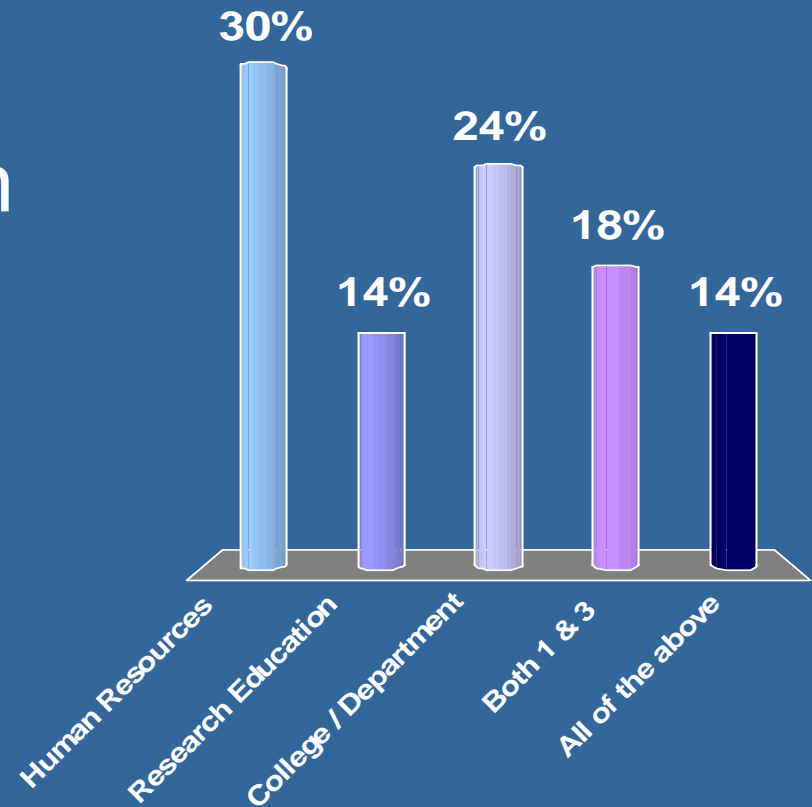
# Should participation in Col policy training be:

1. Mandatory
2. Voluntary



The majority has selected **mandatory participation**.  
Official records of attendance should  
be maintained by:

1. Human Resources
2. Research Education
3. College /  
Department
4. Both 1 & 3
5. All of the above



## Discussion Item: **Method of Delivery**

- Identify and understand all target audiences
- Conduct detailed Needs Assessments
- Prepare “Feature / Benefit” tables for each proposed method of delivery
- Marketing and Promotional Strategies
- Evaluation Processes
- Administration Costs

## Case Scenario: **Method of Delivery**

### Options:

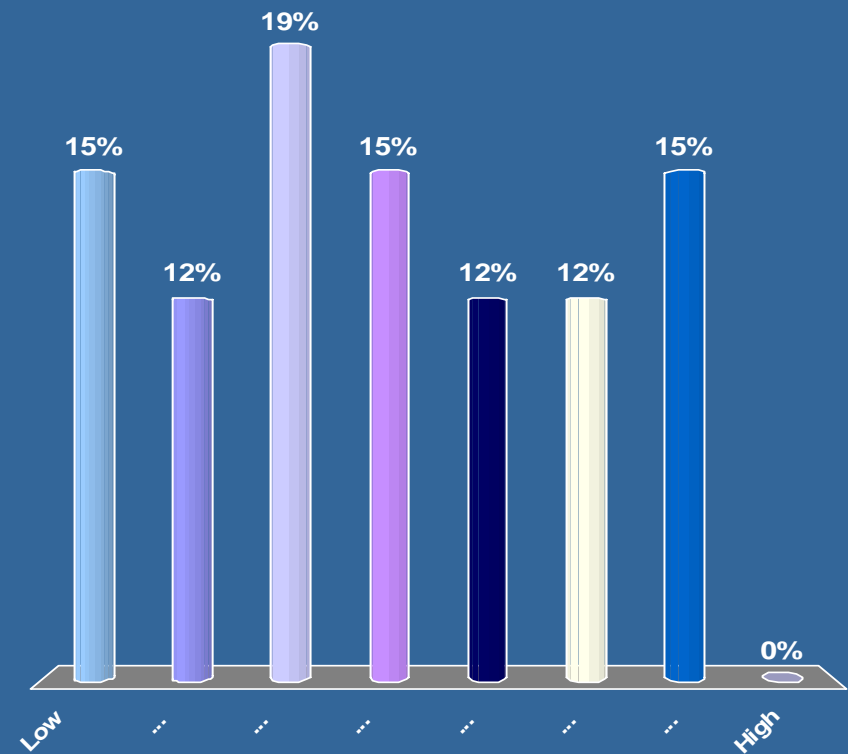
- Policy Letters, Emails & Web Postings
- Online Training Courses
- Classes, Workshops and Meetings

### Desired Outcomes:

- Effective learning and retention (Program Quality)
- Broad-based attendance (Level of Outreach)

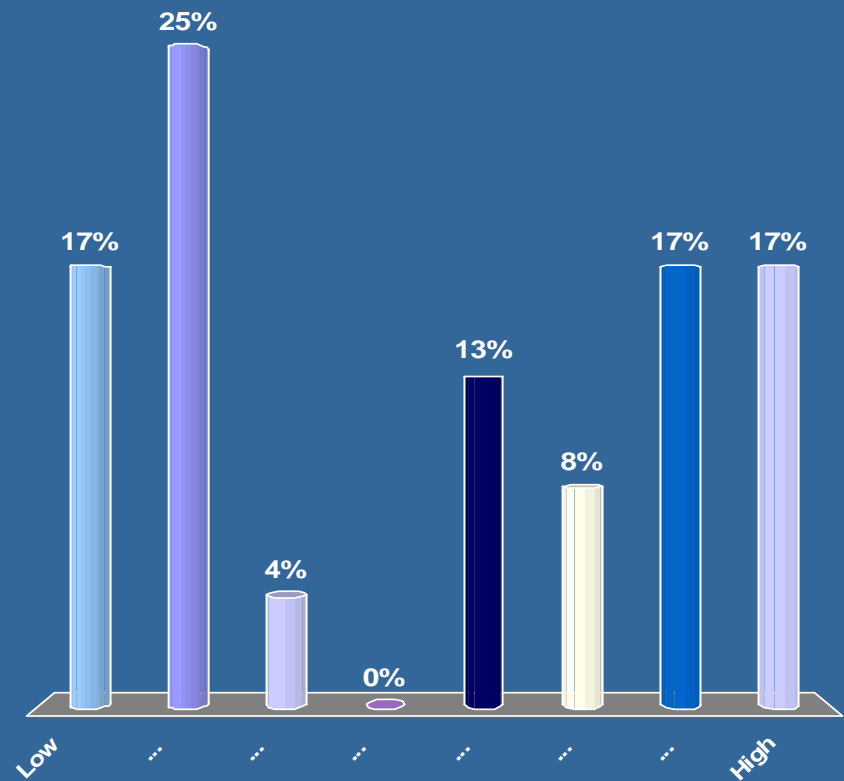
# Policy Letters, Emails & Web Postings: Program Quality

1. Low
2. ...
3. ...
4. ...
5. ...
6. ...
7. ...
8. High



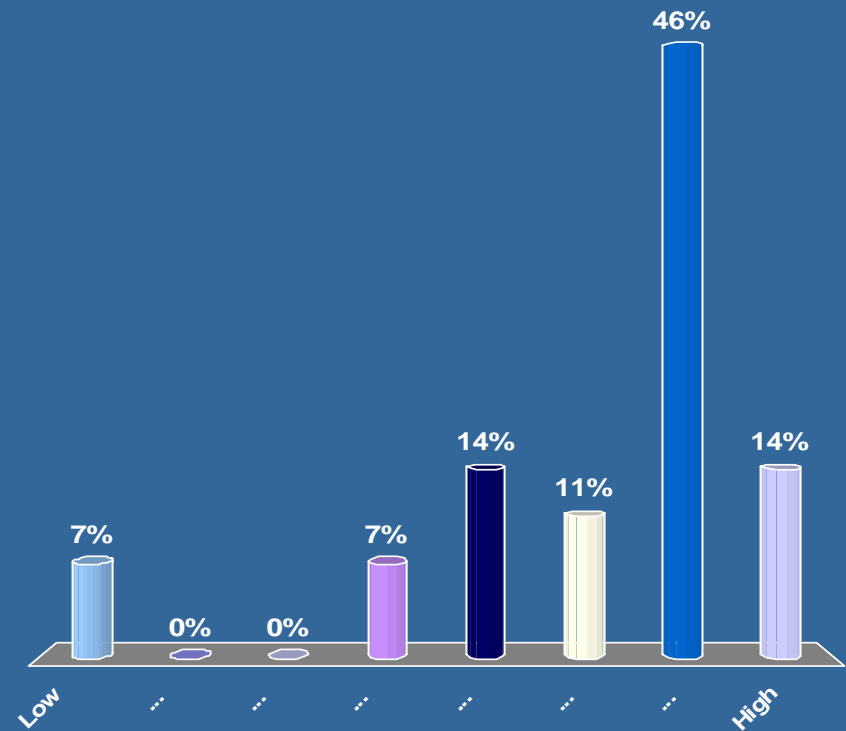
# Policy Letters, Emails & Web Postings: Level of Outreach

1. Low
2. ...
3. ...
4. ...
5. ...
6. ...
7. ...
8. High



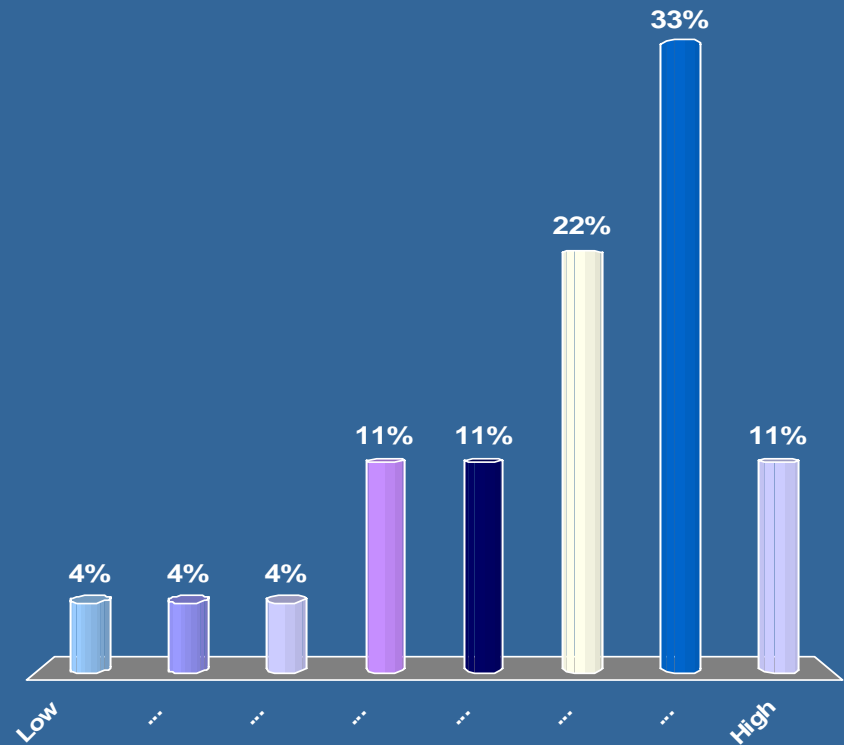
# Online Training Courses: Program Quality

1. Low
2. ...
3. ...
4. ...
5. ...
6. ...
7. ...
8. High



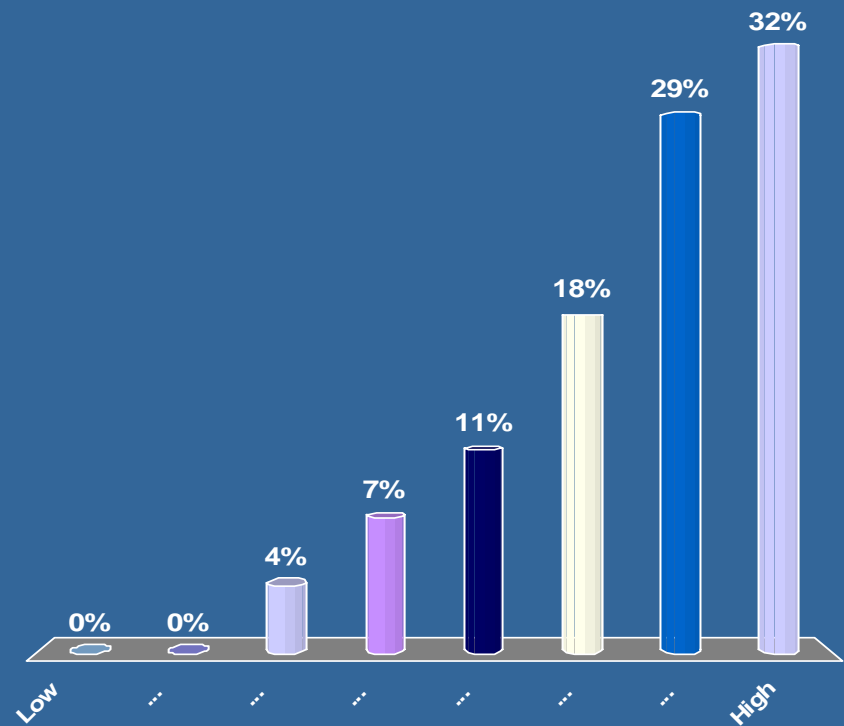
# Online Training Courses: Level of Outreach

1. Low
2. ...
3. ...
4. ...
5. ...
6. ...
7. ...
8. High



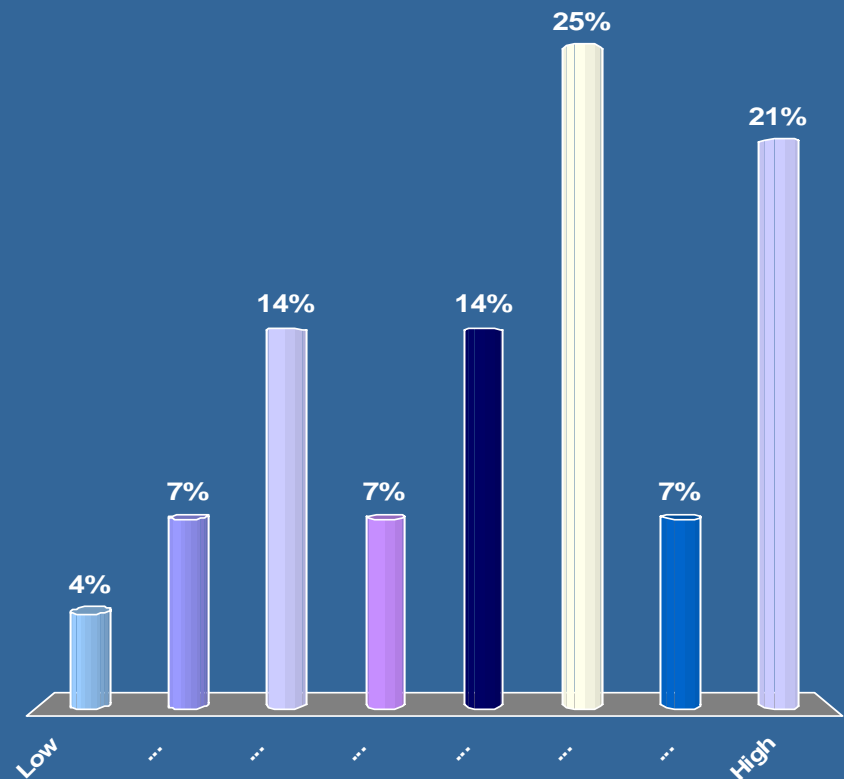
# Classes, Workshops & Meetings: Program Quality

1. Low
2. ...
3. ...
4. ...
5. ...
6. ...
7. ...
8. High



# Classes, Workshops & Meetings: Level of Outreach

1. Low
2. ...
3. ...
4. ...
5. ...
6. ...
7. ...
8. High





● Policy Letters, Emails & Web Postings ● Online Training Courses ● Classes, Workshops & Meetings

# Take Home Points



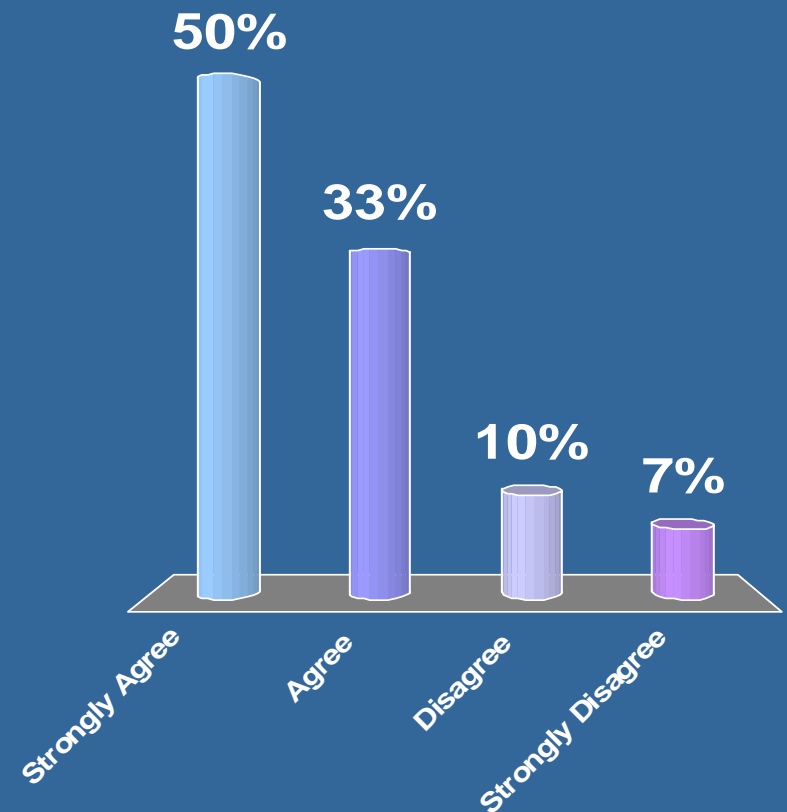
- Focus on training program content and educational outreach objectives
- Evaluate and implement methodologies based upon your unique institutional culture
- Consider incorporating interactive technologies for instruction, data collection and assessment purposes

# Any Questions?



# What is your opinion .....

1. Strongly Agree
2. Agree
3. Disagree
4. Strongly Disagree



# Reminder .....

Please return your  
ResponseCard®



*Thank You!*

