Overview

Government regulations, University policies, and sponsor requirements require that researchers’ external financial interests/relationships be assessed relative to each body of research in which they are engaged. Continuing compliance requires ongoing disclosure by researchers and ongoing review by the University. External financial interests/relationships are not bad and do not automatically present COI concerns. A COI determination for relatedness to a particular body of research is made when an external interest/relationship relates to and could directly and significantly impact or bias the research. COIs must be eliminated, reduced or managed.

UVA’s COI in Research Policy is available here. Full website here.

Key points for research-related COI disclosure, review, and management processes

Who must disclose?

Anyone who is an ‘Investigator’ - An individual responsible for research design, conduct, or reporting. e.g., individual(s) who have the authority to make independent decisions about the direction of the research and the subsequent conclusions about the results and are likely to be authors on manuscripts or to present research findings). Does not include administrative personnel or individuals who perform routine, pre-defined, or incidental tasks related to the project.

Where do I disclose?

In eDisclosure. Click here to access the eDisclosure system.

What do I disclose?

Significant Financial Interests (SFIs) related to your institutional responsibilities:

- Compensation / payments for service (> $5,000* from single entity in previous year)
- Equity in non-publicly traded entity (any ownership/equity interests, even if valued at $0)
- Equity in publicly traded entity (> $5,000* value)
- Intellectual property interests (> $5,000* from single entity in previous year)
- Sponsored/reimbursed travel (> $5,000 from a single entity in previous year)

There are many exceptions for what needs to be disclosed. Dave Hudson is glad to answer any questions dhudson@virginia.edu 434.243.0900

When do I disclose?

- Prior to submitting a proposal for sponsored research funding;
- Within 30 days of new SFIs; and
- At least annually

Annual disclosure is not enough if you acquire/receive/obtain new SFIs throughout the year! If you have no new SFIs that arise throughout the year, annual disclosure is sufficient (and required, even if acknowledging no change).

What happens to my disclosure?

Your disclosure is initially reviewed by the COI Research Officer to determine relatedness to funded research activities.

If additional review is required, the review is referred to the Conflict of Interest Committee.

Final disposition for every project on which you are an ‘Investigator’ is either ‘No Conflict’ or ‘Conflict Managed’.

What happens if a COI is identified?

The VPR Office and COI committee will work with you to reduce, manage, or eliminate any COIs. In most cases, a COI management plan will be implemented to mitigate even the perception of a lack of objectivity in the research due to the COI. The most common strategy for COI management is transparency relative to the relationship/interest through disclosure. Contact Rob Merhige (RobM@uvapf.org ) for examples of ways to disclose COIs to research teams, research subjects, and in presentations and publications. If sponsor COI reporting is required, VPR’s Research Officer handles these requirements and will notify you if and when such reporting occurs.

Questions? Help? Contact cheryl-vpr@virginia.edu / 434.243.1100