



Conflicts of Interest, Overview and Process

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Content Covered

1. What is a Financial Conflict of Interest?
2. Why Should We Care About Conflicts of Interest?
3. Who Needs to Complete a COI Report?
4. When do COI Reports Need to be Completed?
5. What Needs to be Reported: External Interests
6. Project Specific Disclosures: What Are They?
7. Now what?
8. What Does a Management Plan Look Like?
9. How Does This Impact Sponsored Research?

What is a Financial Conflict of Interest?

A financial interest that is likely to compromise or influence — or appear to reasonably well-informed people to be likely to compromise or influence — the objective design, conduct, reporting, or direct administration of research.

The appearance of a conflict of interest may be just as serious and potentially damaging as an actual lack of objectivity and needs to be managed with equal rigor.

Conflicts are neither good nor bad, they're just a set of circumstances

Why Should We Care About Conflicts of Interest?

Conflicts of interest can:

- Degrade the public's trust in research
- Reduce funding opportunities
- Interfere with a student's ability to make progress toward his or her degree
- Impact the integrity of research results
- Lead to Conflicts of Commitment between researchers and their obligations to Cornell or sponsors

Who Needs to Complete a COI Report?

COI reports must be completed by all academics and anyone who is engaged in research. If you are required to complete a COI report, you will receive an email directing you to do so. This includes but may not be limited to:

- **Individuals with academic titles:** Professors, Postdocs, Lecturers, Research Associates, etc.
- **For sponsored research:** Principal investigators, co-principal investigators, co-investigators, key personnel, and anyone who is involved in the design, conduct, reporting, or direct administration of research.
- **For non-sponsored research:** Those whose role on the research project is synonymous with the roles described above, for sponsored research.
- **For IRB Protocols:** Non-student Principal Investigators and co-investigators
- **Other:** In some cases, students must also complete COI reports.

When do COI Reports Need to be Completed?

COI reports are completed on a rolling basis and must be updated at least annually, and when certain circumstance change. Some events that may trigger the need for an update are:

- When external commitments and financial interests change
 - New consulting work
 - Incorporation of a start-up company
 - Receipt of equity
 - Service on a Board of Directors
- Before a proposal for funding can be submitted
- During a career change
 - Upon appointment at Cornell
 - When newly assigned to a research role

What Needs to be Reported: External Interests

There are several types of information that researchers are required to provide in their COI reports. In the COI reporting system, individuals are given clear and specific instructions about what to report and what can be excluded. Generally, the following must be reported:

- **Outside Activities***: Consulting, employment, board service, speaking engagements, management or advisory work.
- **Equity***: Ownership or equity in privately or publicly traded companies. Some things, such as mutual funds or retirement accounts, are excluded.
- **Licensed IP***: Intellectual property interests in which the researcher is a party to or a beneficiary of, a licensing, patent, royalty, or other type of agreement. Some things, such as book royalties, or royalties paid directly from Cornell, are excluded.
- **Travel**: Any foreign or domestic travel that is related to the researcher's institutional responsibilities and is paid for or reimbursed by non-Cornell entities.
- **Start-up Companies**: If you are thinking of starting a company to commercialize your Cornell research, please get in touch! (coi@cornell.edu). The COI team and others are here to help you navigate the process.

* This information must be provided about both the reporter and their family

Project Specific Disclosures: What Are They?

A Project Specific Disclosure (PSD) is a short questionnaire that is used to indicate whether there is a connection between a researcher's relationships with external entities and their Cornell research. This information is necessary to determine whether a COI exists and needs to be managed. Researchers will be notified via email when they need to complete a PSD.

The following information is gathered in the Project Specific Disclosures

Does the entity with which the researcher has an external relationship:

- *Sponsor or provide funding (including gifts) for the research?*
- *Manufacture, commercialize, or develop a product that is being used, evaluated, or developed in the course of the research?*
- *Have an interest in intellectual property that has been or will be developed over the course the research?*
- *Have a collaborative role in the research?*

Now what?

After COI reports and PSDs are submitted, the COI staff reviews this information to determine whether a conflict of interest exists.

- Total COI reports: 5,046
- Project Specific Disclosures submitted: 4,250

For cases in which there is no COI, the review process is completed.

For cases in which there is a potential for a COI, our office works with the researcher directly to have a more in-depth discussion about what their external relationship involves so we can determine if there is a COI that needs to be managed.

Given the high volume of COI reports and PSDs that are submitted, we always review those with the greatest impact on sponsored funding and licensing agreements first, in an effort to reduce delays in releasing funding and licensing agreements.

Friendly reminder: COIs are a set of intersecting relationships, and although they are not inherently bad, they must be properly managed to protect the integrity of Cornell research.

What Does a Management Plan Look Like?

When a COI between someone's financial interest in a company and his or her research is identified, a conflict management plan is put into place. Each management plan is overseen by a Conflict Manager, usually the Department Chair.

Management plans require that:

- Disclosures of the financial interest are made to students, staff, and collaborators involved in the research, editors of journals, and organizers of conferences where related research results are presented
- Undue influence is not exerted over Cornell staff or students under the conflicted person's supervision
- Pre-existing employment obligations to Cornell and sponsors are met
- The conflicted researcher does not negotiate with Cornell on behalf of the company or influence Cornell or its faculty to advance the interests of the company
- Company employees refrain from seeking appointments in the conflicted faculty member's lab
- Cornell staff and students under the conflicted researcher's supervision do not have paid appointments at the company
- Cornell resources are not improperly used for company business
- Human participants are not involved in research related to the company

How Does This Impact Sponsored Research?

Failure to complete or update COI reports and Project Specific Disclosures can lead to delays impacting sponsored funding.

- All key personnel on grant proposals must complete a COI report before OSP can submit the proposal
- For individuals who have a COI, a management plan must be in place before award acceptance
- Managed conflicts related to federally-funded research may need to be reported to the federal agency

RASS Demo

Contact Us!

COI Team

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For additional information about COI policies and procedures, case studies and FAQs, visit the COI website:
<https://researchservices.cornell.edu/compliance/conflict-of-interest>

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For RASS access, support and training go to: RASS Guide Site <https://guide.rass.cornell.edu>