

Financial Conflicts of Interest (COI) (HRPP 1.25)

Description:

This policy describes UNMC's procedures for identification, management, and minimization or elimination of financial conflicts of interest (COI) that could influence the conduct of research or the integrity of the HRPP.

Definitions:

Conflicts of Interest (COI): situations when any study personnel's direct/indirect personal financial interests or duties owed to third parties may compromise their professional judgment or behavior in carrying out research obligations.

Significant Financial Interest: (1) anything of monetary value that **exceeds \$5,000** which the covered person has received **in the past 12 months** preceding disclosure or intends to or had knowledge of earning during the reporting year; or (2) any equity in a non-publicly traded company.

- A financial interest of the covered person that reasonably appears to be related to the Responsible Person's institutional responsibilities during the course of the research.
- An interest "related to the research" is one the COI Officer, COI committee, or the IRB reasonably determines could directly and significantly affect the design, conduct or reporting of research.

Policy:

Any responsible personnel listed on the IRB application who has a COI must disclose it.

The IRB will interact with COI Officers, COI Committees, and/or senior administrators responsible for compliance and/or COI to ensure that appropriate COI management plans are in place.

Any changes in financial interest must be promptly disclosed and managed.

COI Management Plan:

A COI Management plan will be developed for research if financial interest is significant (exceeding \$5,000). This could include:

- Disclosure of COI in consent form
- Disclosure in any presentations, publications, or news articles regarding the research
- Disclosure to all personnel involved in the research