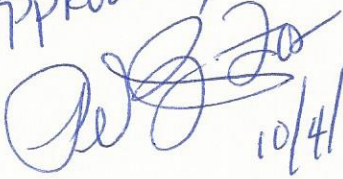


**University of New Orleans
Conflict of Interest Policy Supplement – Public Health Services awards**

Approved,

 10/4/13

Introduction

This policy applies only to individuals involved with projects funded by a Public Health Services (PHS) entity; this includes all institutes within the U.S. Department of Health and Human Services (which includes the National Institutes of Health). The funding can either be directly from the PHS entity or indirectly through another entity (pass-through funding). All individuals who meet the definition of an Investigator (refer to the main Research Conflict of Interest Policy for a definition) must be in compliance with this policy before a PHS award can be accepted by UNO.

Below is a summary of the additional compliance items for PHS awards as identified in 42 CFR 50 Subpart F:

What must be disclosed	<ul style="list-style-type: none"> • Financial interest related to all institutional responsibilities, not just related to the proposed project • Reimbursed travel (more details and exceptions are provided in this document)
Frequency of disclosure	<ul style="list-style-type: none"> • If significant financial interest, must have annual disclosure (NOTE: UNO requires annual disclosure of all financial interests)
Training on policy	<ul style="list-style-type: none"> • Must be done before begin work on any PHS project • Must be done every four years • Must be done immediately if new Investigator on project, revisions to policy, or not compliant
Disclosure of Financial Conflict of Interests	<ul style="list-style-type: none"> • All financial conflict of interests must either be disclosed on public website (only basic information on the conflict) or made available within 5 business days of an inquiry • Annual disclosure to PHS entity
Retrospective Reviews	<ul style="list-style-type: none"> • Performed if Investigator is not compliant with this policy (failed to follow management plan or failed to timely and accurately report financial interests) • If bias is discovered, a mitigation report will need to be prepared and submitted to the PHS entity

Definitions (related to this supplement; further definitions are provided in the main Conflict of Interest Policy)

1. **Institutional responsibilities** include all of the Investigator’s University professional responsibilities. This includes such activities as research, research consultation, teaching, professional practice, and committee memberships (includes review panels such as the Institutional Review Board).

2. In addition to the definition in the main Conflict of Interest Policy, a **financial interest** also includes the Investigator's (and his/her immediate family as described in the main conflict of interest policy) receipt of income related to intellectual property rights and interests (e.g. patents, copyrights) as it relates to the Investigator's institutional responsibilities.

Guidelines for Disclosure

Under this supplement, Investigators must report all financial interest (as defined in the main Conflict of Interest policy) related to their institutional responsibilities and not just the proposed project; this also includes the financial interest of their immediate family. The reporting must be done at the time of proposal submission and annually if there is a financial interest to disclose. If an individual who meets the definition of an investigator joins the project after the proposal submission, the individual must complete the Conflict of Interest form prior to beginning work on the project. New financial interests must be disclosed within 30 days of acquiring or discovering the interest. The new interest must be reviewed within 60 days of reporting.

All reported financial interests are reviewed first by the Vice President for Research and Economic Development to determine if the interest is significant and possibly represents a potential or actual conflict with the proposed PHS project. If a potential or actual conflict exists, the matter will be directed to the Conflict of Interest Review Committee (CIRC) for resolution, as discussed in the main Conflict of Interest Policy.

In addition to reporting financial interests, Investigators must also report on their sponsored or reimbursed travel. The travel must be related to the individual's institutional responsibilities and not be reimbursed/sponsored by a Federal, state or local government entity, an institution of higher education, an academic teaching hospital, a medical center, or a research institute that is affiliated with an Institution of higher education. The following travel information must be disclosed:

- Purpose of trip
- Name of the sponsor/organizer
- Destination
- Duration of trip
- Estimated cost of trip, if known

The Vice President for Research will determine if the disclosed trip will need to be reported to the CIRC.

Disclosure Procedures

All Investigators must complete the PHS Conflict of Interest form at the time of proposal submission. All financial interests and travel which occurred during the previous 12 months must be reported on the

form. In addition, Investigators will be asked to complete the form on an annual basis. The Office of Research will coordinate the reporting.

New Investigators to the project will be required to complete the form (which is on the Office of Research website) prior to beginning work on the project.

Subrecipients, Subcontractors, and Academic Collaborators

Subrecipients, subcontractors, and collaborators on PHS awards must adhere to the PHS guidelines as detailed in 42 CFR 50 Subpart F; agreements with these entities will reference the CFR. These outside entities must either certify that their Conflict of Interest Policy follows the PHS requirement or agree to follow UNO's policy. If the outside entity will be following their policy, certification of compliance must be obtained from the entity at the time an agreement is made and there needs to be an agreed upon reporting time frame for identified significant financial conflict of interests. If the entity will follow UNO policy, the policy will be referenced in the agreement as well as the reporting time frame. The identified reporting time frame must take into account UNO reporting deadlines to the PHS entity.

Reporting

If a financial interest is determined to be a conflict for a PHS award and cannot be eliminated, the interest must be reported to the PHS entity. When reporting the interest, UNO certifies that a management plan is in place for the existing interest. The reporting is done for both UNO Investigators and subrecipient/subcontractor/collaborator Investigators. Annual updates on the interest must also be submitted; updates are due at the same time as the progress reports for the award. Updates are also required within 60 days of disclosure of a new or newly identified financial conflict of interest.

In addition to reporting to the PHS entity, the University will make available within 5 business days of receipt of an inquiry the following information concerning a financial conflict of interest that cannot be eliminated:

- Investigator name
- Title and role of Investigator
- Name of entity in which the financial interest is held
- Nature of interest
- Approximate dollar value

Information on the financial conflict of interest will be made available for three years after submission of the final update to the PHS entity.

If the PHS project involves human subjects, all human subjects will be informed of the existing financial conflict of interest.

Training

As part of the requirements in 42 CFR 50 Subpart F, all Investigators must complete training on this Conflict of Interest Policy prior to working on any PHS award and every 4 years thereafter. For Investigators at outside entities, they can complete their entity's training or UNO's training (this depends on the entity having an acceptable policy). If an Investigator joins the project in the middle of the award, the Investigator cannot begin work on the project until the training is complete. In addition, training will be required if an Investigator is found to be non-compliant with this policy, which includes following a management plan for an existing conflict of interest. Training will also be required if there is a change to this policy. UNO training will be offered through the Office of Research via an electronic training document.

Retrospective review

If during the course of the project it is discovered that an Investigator is not in compliance with this policy (failed to properly and/or timely report a financial interest or failed to follow the agreed upon management plan), the matter will be referred to the Research Council for retrospective review. This review will be done within 120 days of discovering the noncompliance.