Annual Conflict of Interest and Consulting Reporting

Kelly Beiswanger, Compliance Manager
Conflict of Interest & Consulting Activities Annual Reporting

- **Who:** Non-Classified 0.5FTE+
- **Why:** Required by BOR and screening tool for MSU COI Management Plans
- **Reporting Period:** Retroactive - *September 1, 2016 to Present Day*
Reporting Schedule

– Launch: 10/23/17
– Employee Reminders: following weeks
– Reporting Deadline: November 27
– Approver/Supervisor Reports: Early December
– Campus Reports to BOR: December 31
New for 2017

• MyInfo Notifications
Circumstances Requiring Disclosure

• Related Outside Interest

– Example: A MSU Faculty Researcher has an outside consulting contract with the *CHEMISTRY COMPANY*. Then the *CHEMISTRY COMPANY* decides that it would like to sponsor research in the Faculty member’s MSU lab.
Circumstances Requiring Disclosure

• Related Purchase/Sale

  – Example: MSU Employee owns outside company GREAT COMPANY. MSU employee is in a position to recommend or approve a MSU purchase of supplies from GREAT COMPANY.
Circumstances Requiring Disclosure

• Related Sponsored Research Interest (SFI)

  – Example: An AY MSU PI makes $6,000 per year outside of MSU working for PRETTY GOOD COMPANY. PGC’s specialty is in the same area as the PI’s academic area of interest. The PI receives a grant from NIH. The results of this sponsored research at MSU could significantly and directly affect PGC.
Circumstances Requiring Disclosure

• Related Outside Position

  – Example: A Professional Employee at MSU works in an office that provides business advice to companies for a fee. The Employee is also on the Board of Directors at local Bozeman start-up. The start-up comes to MSU to sign up for the business advice package.
Circumstances Requiring Disclosure

• Employee Inventor Equity Interest and/or Business Participation

– Example: MSU Employee invents a new technology at MSU. The Technology Transfer Office licenses the technology to *GOOD COMPANY*. Then, *GOOD COMPANY* offers the MSU Employee Inventor some equity at the company.
Circumstances Requiring Disclosure

- Nepotism/Consensual Romantic Relationship

**Diagram:**
- Department Head or other non-related party
- Sister
- Brother

Relatives cannot supervise one another.
Circumstances Requiring Disclosure

• Outside Supervisory Interest

  – Example: Any case of supervising an employee both at MSU and outside of MSU – having authority over or the ability to provide direct benefit or detriment
• MyApps Demo
  – 4 Campus Resource Page

• Bozeman Resource Website
Other Reporting

• Anytime throughout year by anyone
• ORC online form
• Call, email, visit!
• Anonymous Hotline
• Sponsored Research
Sponsored Research Reporting

– Who?
  • PIs and Investigators by PHS definition

– What?
  • Significant Financial Interests & Sponsored Travel

– How?
  • OSP e-PCF

– When?
  i. Prior: at proposal submission stage
  ii. During: if SFI is acquired
Compliance Review Boards

<table>
<thead>
<tr>
<th>Compliance Area</th>
<th>Protocol Numbers</th>
</tr>
</thead>
<tbody>
<tr>
<td>Human Subjects</td>
<td>Policy No</td>
</tr>
<tr>
<td>Bio-Medical Animals (IACUC)</td>
<td>Policy No</td>
</tr>
<tr>
<td>Agricultural Animals (AACUC)</td>
<td>Policy No</td>
</tr>
<tr>
<td>Biosafety: rDNA, Infectious Agents,</td>
<td>Policy No</td>
</tr>
<tr>
<td>Biological Toxins, Select Agents (IBC)</td>
<td></td>
</tr>
<tr>
<td>Ionizing Radiation or Radioactive Material (RSC)</td>
<td>Policy No</td>
</tr>
</tbody>
</table>

Comments for Compliance Review Boards

Attachments for Compliance Review Boards

File List: No Compliance Review Board Attachments Listed

Conflict of Interest

1. Do any proposed Investigators, including their family members, have any significant financial interests (income of greater than $5,000/in the last 12 month period, when aggregated with family members, consulting agreements, management responsibilities, or ownership interests in publicly traded companies of greater than $5,000 or any ownership interest in a non-publicly traded company, when aggregated with family members) that are reasonably related to any of the Investigator’s Institutional Responsibilities, as defined in MSU’s Conflict of Interest Policy? If yes, each such Investigator must fill out the Research Disclosure form and attach a copy to this proposal. The Office of Research Compliance will need to review and approve.

   No

2. For any U.S. Public Health Service (including NIH) funding proposals: Have any proposed Investigators received any sponsored or reimbursed travel from a third party (not including travel paid through MSU sponsored research funds) in the previous twelve months? If yes, each such Investigator must fill out the Sponsored or Reimbursed Travel form and attach a copy to this proposal. The Office of Research Compliance will need to review and approve.

   No

View Conflict of Interest Policy

Export Control