

Conflict of Interest

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Coffee with ORPA

Conflict of Interest Outline

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- D. Types of Conflict of Interest (COI)
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What is a Conflict of Interest (COI)?

A COI is any circumstance where personal, professional, financial or other private interests of a person or institution compromise or have the potential to compromise the exercise of professional judgement or obligations, or may be perceived as doing so.

Merriam Webster Dictionary

What are Princeton's Conflict of Interest Policies?

Federal Regulation COI Policies

- A. NIH requires recipient institutions and investigators to comply with the requirements of [42 CFR 50, Subpart F](#), "Responsibility of Applicants for Promoting Objectivity in Research for which PHS Funding is Sought"
- B. Proposal & Award Policies and Procedures Guide
 - A. NSF 20-1 June 1, 2020
[Chapter IX.A](#) - Grantee Standards - Conflict of Interest Policies

Princeton Internal COI Policies can be found on the Research and Integrity Home Page

<https://ria.princeton.edu/>

- A. Policies - COI Tab - Policies and Guidelines
- B. COIR Panel Charter - COI Tab - Regulations and Resources

What is the Conflict of Interest in Research Panel?

A committee that promotes integrity in research by reviewing, identifying and managing disclosed conflicts of interest.

Membership consists of University leaders with expertise and understanding to review and determine whether or not a conflict of interest exists.

Members include:

- Dean for Research (DFR; Chair)
- Dean of the Faculty (DOF)
- Dean of the Graduate School (DGS)
- Dean of the School of Engineering and Applied Science
- General Counsel
- Director, Office of Technology Licensing (OTL)
- Director, Research Integrity and Assurance (RIA)
- A minimum of 3 Tenured Faculty Members

Convenes at least semiannually

What are the COIR Panel's Responsibilities?

The COIR Panel Reviews the following types of conflicts to determine whether a real or potential conflict of interest exists:

- Conflicts of Commitment (COC) – Dean of the Faculty, ORPA
- Conflicts of Resources (COR)
 - Undergraduate – Dean of the College
 - Graduate – Dean of the Graduate School
 - Academic Professionals – Dean of the Faculty
 - Space/Equipment – RIA, DOF, COIR Panel
- Financial Conflicts of Interest – RIA, DFR, COIR Panel

When the DFR or the COIR Panel determines that a conflict of interest exists a Management Plan (MP) is implemented.

Submission Process

Annual Disclosure submission:

- Collaboration between the Dean of the Faculty's office and the Dean for Research's Office, annually
- Affects all DOF appointees (Faculty, Academic Professionals and Professional Librarians) and other federally funded individuals (including graduate students) that are identified as a PI, Co-I or key person
- Submitted via the electronic COI Reporting System

For PHS funded principal investigators:

- Annual Disclosures relating to institutional responsibilities
- Disclosures relating to reimbursed and/or sponsored travel
- Disclosures of new significant financial interests related to institutional responsibilities throughout the year
- Ensure completion of FCOI CITI training by PHS funded investigators

For Non-PHS funded and all non-funded DOF appointees:

- Annual Disclosures relating to institutional responsibilities
- Disclosures of new significant financial interests related to institutional responsibilities throughout the year

Conflict of Interest Disclosure Forms

A. Annual Disclosure Form

B. Conflict of Interest Update Form

C. Travel Disclosure Form – currently PHS only

Conflict of Interest Disclosure Forms

Annual Disclosure Form

- Part A: Engagements (Work) with Outside Organizations;
- Part B: Management or Fiduciary Responsibilities;
- Part C: Nepotism, Personal Relationships, and Other Policies in the Workplace;
- Part D: Purchasing and Contracts;
- Part E: Gifts and Solicitations;
- Part F: Use of Resources Including Students, Staff and Equipment or Space;
- Part G: Significant Financial Interests Relating to your Institutional Responsibilities; and
- Additional Information.

Conflict of Interest Disclosure Forms

Conflict of Interest Update Form

- Part A: Significant Financial Interests Relating to your Institutional Responsibilities; and
- Part B: Use of Resources Including Students, Staff and Equipment or Space.

Conflict of Interest Disclosure Forms

Travel Disclosure Form (PHS funded only)

- The PHS regulations require each investigator to disclose the occurrence of any reimbursed or sponsored travel by an outside entity other than Princeton that is related to the investigator's institutional responsibilities **within thirty (30) days of the travel;**
- Sponsored travel is that which is paid on behalf of the investigator and not reimbursed to the investigator so that the exact monetary value may not be readily available;
- Note that travel includes transportation, living accommodations, and food.

Types of Conflict of Interest (COI)

Conflicts of Commitment (COC)

- A COC can occur by any person when outside activities are involved. A faculty member can have an outside activity which can affect their ability to perform their institutional responsibilities of teaching, research and/or service.
- With increased scrutiny on inappropriate foreign influence by the federal government, this in turn has increased the scrutiny on PI's outside activities in terms of commitment, effort levels, and resources (e.g. external funding, in-kind support).

Conflicts of Resources (COR)

- A faculty member can have a COR if they decide to utilize their lab space and/or equipment and/or engage personnel (students, post-docs, laboratory professionals) in their outside activities.

Financial Conflicts of Interest (FCOI)

- A term that means a (significant) financial interest that could directly and significantly affect the design, conduct, or reporting of funded research.
- The goal in managing an FCOI is to ensure the (funded) research (or teaching, service) can be free from bias that may result from the financial interest.
- There is heightened scrutiny when this funded research is sponsored by the federal government.

What is a Conflict of Commitment (COC)?

A COC exists when:

- A `conflict of commitment' arises whenever a DOF appointee's outside consulting and other activities have the potential to interfere with their primary duties, including teaching, research, time with students, or other service and administrative obligations to the university.

What is a Conflict of Commitment (COC)?


PART A. WORK FOR OUTSIDE ORGANIZATIONS

1.0 During the last 12 months (i.e. calendar year 2020) have you worked as an employee, independent contractor or consultant (paid or unpaid) for any **domestic or foreign** organization other than Princeton? If yes and paid (directly or indirectly), please disclose the amount of payment received as directed in Part G (Significant Financial Interests). The term "organization" includes domestic or foreign governments, and domestic or foreign corporations, universities, professional associations, or institutions. It also includes entities that may be related to Princeton, or in which Princeton has an interest (e.g., a faculty start-up company is an "organization" regardless of whether Princeton has any interest in the entity.)

- Include all **domestic or foreign** consulting and teaching anywhere other than Princeton, lectures given at for-profit organizations, and media presentations intended for the general public. Please include teaching or administrative activities at any **domestic or foreign** academic institution other than Princeton. Please also include days spent as a member of a company's scientific or technical advisory board and days engaged with management and fiduciary responsibilities.
- DO NOT include **academic or scholarly** presentations or lectures at not-for-profit institutions (e.g. seminars at other universities), service on **academic or scholarly** advisory committees or services on review panels for **domestic** governmental or non-profit organizations (e.g., **proposal review panels, award committees**)

No Yes

1.1 Please list all activities below. The table within this section (1.1) contains information you may have entered last year. To add an entry, please fill the boxes and click the **green check mark button** after each of your entries. To edit or delete existing entries, click on the appropriate button to the right of the pre-populated table within this section (1.1).

Company/Organization (please include whether the organization is foreign/domestic, profit/nonprofit, public or private)	Position/Title, Nature of Work and Relationship with your Activities at Princeton	Number of Days Academic Yr.	Number of Days Summer
	member Scientific advisory board, not paid. Just a 1-2 calls a year in practice. We have a joint STTR NIH grant (small business development grant).	1.0	0.0
Total:		1.0	0.0

What is a Conflict of Commitment (COC)?

3.0 How many months of summer salary did you receive last summer? This number should not be greater than 2.5 months. (If you are a 12 month employee or do not draw a summer salary, please enter 0). Please note that the total number of days of summer salary plus the number of days performing activities during the summer listed in section 1.1 may not exceed 90. For information on the University's summer salary policy, please use the following link:

[Summer Employment](#)

Numbers only please

4.0 Please estimate the number of teaching days during the last 12 months (i.e. calendar year 2020) that you have been off campus. Teaching days consist of:

- All weekdays during the fall and spring semesters (from the beginning of classes through the last day of the exam period).
- Excluded are fall recess, Thanksgiving recess, winter recess, intersession and spring recess.
- The Academic Calendar can be found on the [registrar's website](#).

Numbers only please

5.0 If your primary responsibilities include teaching and the number of teaching days off campus for the academic year exceeds 36, please provide an explanation. Include in your response whether you were on paid/unpaid leave or the date you started working at Princeton University. Please limit your response to 2000 characters.

What is a Conflict of Commitment (COC)?

PART B. MANAGEMENT AND FIDUCIARY RESPONSIBILITY

1.0 During the last 12 months (i.e. calendar year 2020) have you had a management or other fiduciary role in any **domestic or foreign** organization other than Princeton? This includes, but is not limited to, service as a:

- CEO, CFO or other officer, board member, supervisor, manager or **owner** at a **domestic or foreign** organization other than Princeton.
- Scientific, technical, advisory or other board appointment at any **domestic or foreign** for-profit, non-profit, or non-governmental organization (NGO).

No Yes

1.1 Please list the organization, the type of organization, the nature of the work and the relationship to your activities at Princeton. Please note that your response may include those institutions listed in Part A and, in addition, **domestic or foreign** non-profit organizations where you have had a management or fiduciary role. The table at the bottom of this section (1.1) contains information you may have entered last year. To add an entry, please fill the boxes and click the **green check mark button** after each of your entries. To edit or delete existing entries, click on the appropriate button to the right of the pre-populated table within this section (1.1).

Company/Organization	Type of Organization	Position/Title, Nature of Work and Relationship with your Activities at Princeton
[REDACTED]	Non-profit	I am legal secretary and ex-officio board member for a non-profit professional society which runs a conference on electronic devices every summer. No relation to Princeton except my research is in this field. No pay.
[REDACTED]	profit, small company	GPB is a small company which licenses some technology from my lab. I have zero ownership. I am on the scientific advisory board, with zero salary or remuneration of any kind.

COC - Inappropriate Foreign Influence - Disclosure

- The disclosure forms have been updated in the last two years to address Inappropriate Foreign Influence (e.g. using the terms “foreign and domestic” entities throughout, adding a government foreign talent recruitment program question).
- When applying for government funding, Princeton employees and affiliates, in their capacity as Principal Investigators, CO-1, or key persons, must disclose all current and pending support, including domestic and foreign contracts, grants, awards, as well as in-kind support, irrespective of whether this support is provided through Princeton or directly to the Principal Investigator. This disclosure requirement applies to support from government, private and not-for-profit sources.

Disclosure

Summary: A person will find 95% of the internal disclosure information in the COI electronic system in the following sections to verify external disclosures.

- **Part A: Work for Outside Organizations**
- **Part B: Management and Fiduciary Responsibility**
- **Part G: Significant Financial Interests Relating to your Institutional Responsibilities**