If an outside activity is undertaken, the faculty member or academic staff member must take reasonable precautions to ensure that the outside employer or other recipient of services understands that the faculty member is engaging in such outside activity as a private citizen and not as an employee, agent, or spokesperson of the University. A faculty member must not engage in any outside activity which the employee may reasonably conclude may create a COI or which may interfere with the full performance of the faculty member's academic responsibilities in the classroom and in non-classroom administrative, research, and advising obligations. Before assuming or continuing any outside activity, a CAMS disclosure must be completed and approved by the RCOI Committee and/or RISE Office.

Training

Certain funding agencies require COI training. However even if not a requirement, FSU strongly encourages all faculty, staff, and students to complete the following:

1. COI course offered by the Collaborative Institutional Training Initiative (CITI Program).
2. Responsible Conduct of Research (RCR) session.
3. Annual training offered by the Office of Compliance and Ethics on CAMS disclosures.

Managing Conflicts

FSU shall take appropriate action to manage financial conflicts of interest, including any financial conflicts of interest of a subrecipient. Management of an identified financial conflict of interest requires development and implementation of a management plan. In addition, management plans require annual reviews to be submitted.

The key to addressing potential conflicts lies in full disclosure. In cases where a conflicting situation requires management, the RISE and/or RCOI Committee collaborates with investigators to devise and implement appropriate plans. In many instances, transparent disclosure of all relevant facts is sufficient to render a situation acceptable.



Research Integrity, Security, and Ethics (RISE) ensures University compliance with federal, state, and local regulations related to research. RISE is responsible for the development, oversight and monitoring of the research compliance program for Florida State University. RISE is your one-stop shop for research compliance matters.

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A QUICK GUIDE TO

CONFLICT OF INTEREST

FSU | RESEARCH INTEGRITY, SECURITY & ETHICS
DIVISION OF RESEARCH

About this Quick Guide

This Quick Guide has been revised by Florida State University's Office of Research, Integrity, Security and Ethics as a brief summary of the laws, regulations, and issues to be considered with regards to conflicts of interest and research in the university setting. While this Guide is designed to assist you in managing your sponsored projects, it is neither comprehensive nor exhaustive. For specific questions, review the applicable policy in its entirety, and contact the appropriate offices as needed.

Conflicts of Interest

Faculty and staff relationships with outside entities must support FSU principal objectives of teaching, research, and service, but should not create inappropriate external biases affecting the freedom of faculty to pursue all areas of academic inquiry.

A COI refers to a situation in which financial or other personal considerations may compromise, or have the appearance of compromising, an individual's or institution's professional judgment in conducting or reporting research, protection of human subjects, or carrying out or directing other types of institutional programs.

A Financial Conflict of Interest means a significant financial interest (SFI) that could directly and significantly affect the design, conduct, or reporting of PHS-funded research. Funding agencies have various definitions of "significant", so the pertinent regulations must be consulted.
A SFI can be any of the following examples:

1. Intellectual Property.
2. Consulting relationships.
3. Advisory board remuneration.
4. Ownership Interest.
5. Position.

A Conflict of Interest in Procurement occurs when an employee engages in the selection, award, or administration of contracts (e.g., purchase orders, services agreements, etc.), or the employee or any member of his or her immediate family, his or her partner, has a financial or other interest in or a tangible personal benefit from a firm considered for a contract.

Conflicts of commitment are generally situations in which a researcher is dedicating time to personal activities in excess of the time permitted by institutional policy, or to other activities that may detract from his or her primary responsibility to the institution.



Disclosure Requirements

Investigators are required to disclose their SFI's, as well as the SFI's of their spouse and dependent children, in accordance with the regulations governing their individual proposal and/or award. Because funding agencies have unique disclosure requirements that may change from time to time, RISE will publish disclosure procedures, reflecting the requirements for each of these agencies, on its website.

Outside Activities

Outside activity is defined as private or public practice, private consulting, additional teaching or research, or other professional activity, compensated or uncompensated, which is not part of the faculty member's assigned duties and for which the university has provided no compensation.

A COI in outside activities is defined as any conflict between the private interests of the faculty member and the public interests of the University, or the State of Florida, including conflicts of interest specified under Florida Statutes, or any activity that interferes with the full performance of the faculty member's professional or institutional responsibilities or obligations.

FSU encourages University faculty and academic staff to undertake outside activities, subject to the conditions stated in the Faculty Handbook, which will increase the employee's professional reputation and service to the community.