

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. 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, an Outside Activity form must be completed and approved by the chair/supervisor and dean/director/vice president. After all necessary approvals have been received, the original of this form must be submitted by the dean/director to the Office of Faculty Development and Advancement.

Training

While COI training is not required by funding agencies, FSU strongly encourages all faculty, staff, and students to complete the free Conflict of Interest course offered by the Collaborative Institutional Training Initiative (CITI Program). research.fsu.edu/research-compliance/training/citi-login-instructions/conflict-of-interest/

If the respondent is found innocent of research misconduct, reasonable efforts to restore the respondent's reputation are made by the university as appropriate. A respondent who has been found guilty of research misconduct has the right to appeal in accordance with FSU's misconduct policy and procedures.



A QUICK GUIDE TO **CONFLICT OF INTEREST**

The Office of Research Compliance Programs (ORCP) is responsible for the development, oversight and monitoring of the research compliance program for Florida State University. ORCP is your one-stop shop for research compliance matters.

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FLORIDA STATE UNIVERSITY
OFFICE OF RESEARCH

About this Quick Guide

This Quick Guide has been published by Florida State University's Office of Research Compliance Programs (ORCP) 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

The University's overall policy on conflicts of interest (COI) is that none of its faculty or staff shall engage in any activities that place them in a conflict between their official activities and any other interest or obligation. Faculty and staff relationships with outside entities must support the FSU mission and its 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 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.

A Conflict of Commitment occurs when any outside activity interferes with the full performance of an employee's assigned duties.



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, the ORCP will publish disclosure procedures, reflecting the requirements for each of these agencies, on its website at research.fsu.edu/research-compliance/conflict-of-interest/

Managing Conflicts

Management of an identified COI requires development and implementation of a monitoring plan. Additionally, monitoring plans require annual reviews to be submitted. Conflict management

is situation specific; the goal is to achieve the simplest effective means of managing the conflict. Conflicts related to human subjects research must be communicated to the Institutional Review Board, and conflicts related to animal research must be communicated to the Animal Care and Use Committee. The key to managing all conflicts of interest is full disclosure!

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.