Conflict of Interest Process

To address situations when outside financial interests may overlap or conflict with a researcher's activities, the University has adopted policies regarding financial conflicts of interest. Real or perceived conflicts of interest, when not appropriately disclosed and addressed, can undermine confidence in the integrity of University research and sponsored programs. Additionally, federal laws and regulations require University to have a process in place to manage conflicts of interest involving federally funded research. University policies and the applicable federal/state regulations recognize that the existence of a potential conflict of interest does not necessarily mean that the outside interest or activity must be avoided or discontinued. Often, potential and actual conflicts of interest can be addressed effectively by disclosure or other steps to resolve or manage the conflict. Conflicts of Interest Committee has been established to review faculty/employees annual disclosures and outside consulting form that present a potential conflict of interest. Conflicts of Interest Committee has the responsibility for developing techniques to manage, reduce, or eliminate, actual or perceived conflicts.

Conflicts of Interest (COI) disclosures fall into two categories: those without outside interests and those with outside interests. COI forms are to be completed: January 2nd to March 1st for the prior fiscal year. New employees should complete the disclosure form upon commencing employment with the University. Outside Activity disclosure form should be completed prior to the start of the outside activity. A summary of each disclosure with outside interests will be presented to the Conflicts of Interest Committee for their review. The Committee members will review the summary, research activity of the disclosing individual and any other pertinent information. They will then determine what action is necessary or request additional information. Depending on the nature of the outside interest, the options the Committee may choose are 1) to manage, 2) reduce or 3) eliminate the interest. In the alternative, Committee may determine that a Management Plan and appointed University Advisor be established. Management plan is designed to protect the employee and to comply with the applicable University policies and federal law. Management plans take the form of an agreement confirming that the employee understands the policies that govern his/her activity at University, and set out requirements that are tailored to the specific activity at the University or outside interest.

In order for any type of research or sponsored program activity to be commenced, a current and complete COI disclosure must be verified. If a current COI disclosure has not been filed, the researcher will be contacted to request that they do so immediately. Failure to have a current disclosure on file or to provide additional information requested by the COI Office may result in a delay of study approval and/or release of research funds.

In addition, all researchers receiving Public Health Service funds must complete an annual COI disclosure form. Researchers are defined as anyone responsible for the design, conduct or reporting of research whether funded or unfunded, throughout the year, the existence and nature of significant financial interests may change. Within thirty days of a change in the status of any significant financial interest or the addition of a new significant financial interest, a new disclosure must be completed. The following are examples of changes that should be reported:
A new significant financial interest

Change in the type of financial interest (i.e. reduction in stock, additional compensation)

Elimination of financial interest

Per 42 C.F.R. Part 50, Subpart F, any institution receiving PHS-funded research projects shall ensure public accessibility of information concerning any significant financial interest (SFI) disclosed to the institution provided that (a) the SFI is held by the senior or key personnel on the research project; (b) the institution has determined that the SFI is related to the PHS-funded research; and, (c) the institution has determined the SFI to be a financial conflict of interest (FCOI). Public accessibility requests must be in writing, whether emailed or mailed via US Post, and must include the name of the senior or key personnel and the title of the PHS-funded research project. Please also provide the PHS grant number, if possible. Requests will be answered in the manner they were received within five business days of receipt by the applicable Conflict of Interest Office and shall include the information required to be disclosed per 42 C.F.R. Part 50, Subpart F. The information provided will be current as of the date of the correspondence. Updates to senior or key personnel SFIs must be made on an annual basis or within 30 days of acquiring a new SFI. In order to access annual updates or new SFIs that are determined to be FCOIs by the institution, a new public accessibility request will be required.

Requests for public accessibility of disclosed FCOIs may be sent to the following:

Nancy Moody JD MA
Director, Research Integrity Office
University of Nevada Reno
Ross Hall, Room 218
Mail Code Stop 0331
Reno NV 89557
nmoody@unr.edu
775-327-2367