



Conflicts of Interest

COI SUBCOMMITTEE MEETING

Conflict of Commitment Working Group Intro

September 23, 2020

Co-Chairs: Diane Dean/NIH & Mary Lee/Stanford



AGENDA

- 1. Business Matters*
- 2. Introduce Co-Chairs of Conflict of Commitment Working Group*
- 3. Identify Conflict of Commitment requirements per Federal Sponsors*
- 4. Sign up to volunteer on COC Working Group!*



COI Subcommittee Business Matters

1. Meeting notes
2. Listserv sign up – COI Subcommittee & COC Working Group
3. Who are our attendees today?



Conflict of Commitment Working Group

Introduction of Co-Chairs

Dr. Alice Young, Research Integrity Officer & faculty member, Texas Tech

Amanda Humphrey, MA, Director of Research Integrity & Export Controls, Northeastern University



Overview of Foreign Influence-COI today

NIH	NSF	DOD	DOE	NASA
<p>Status Quo: 42 CFR Subpart 50, Part F Disclose significant financial interests (including travel) related to PHS-funded research.</p> <p>As per NOT-OD-18-160 (3/2019), disclosure requirement includes financial interests received from a foreign entity.</p> <p>*If your institution's COI policy is stricter than Subpart F, then NIH will require your institution to provide reports per your policies.</p>	<p>Status Quo: PAPPG VII.A.2.e: Conflicts of Interest that cannot be satisfactorily managed, reduced or eliminated and research that proceeds without the imposition of conditions or restrictions when a conflict of interest exists.</p> <p>7/11/2019 NSF Director letter: silent as to COI disclosures, so no change to status quo.</p> <p>Per new policy to be issued, NSF personnel and IPAs may not participate in foreign government talent recruitment programs.</p>	<p>Status Quo: No DOD-specific COI regulation or policy statement. Institutions must carefully read the DOD Memo (3/20/2019), Call Documents, and Grant or Contract terms. 2 CFR 200 COI requirements are often included.</p>	<p>New: DOE Order 486.1 applies to DOE employees, contractor employees of GOCO national labs, subcontractors who work on-site. Affected personnel may not participate in a foreign government talent recruitment program.</p> <p>New: DOE is flowing down similar language in grants / contracts to academic research institutions.</p>	<p>Status Quo: No NASA-specific COI regulation or policy statement. Institutions must carefully read the Call Documents, and Grant or Contract terms. 2 CFR 200 COI requirements are often included.</p>



Foreign Influence-related Conflicts of Commitment – Let’s populate this chart!

NIH	NSF	DOD	DOE	NASA
<p>Other Support</p> <p>Foreign Component</p> <p>Reported via Sponsored Research Office through eRA Commons or email to program officer? Grants specialist?</p>	<p>Current & Pending Support</p> <p>Reported via Sponsored Research Office through eRA Commons or email to program officer? Grants specialist?</p>		<p>DOE Order 486.1A applies to DOE employees, contractor employees of GOCO national labs, subcontractors who work on-site. Affected personnel may not participate in a foreign government talent recruitment program.</p> <p>DOE is flowing down similar language in grants / contracts to academic research institutions.</p> <p>Reported via Sponsored Research Office through eRA Commons or email to program officer? Grants specialist?</p>	



COC Working Group Exercise

1. Go to the much-anticipated NIH activities chart located at <https://grants.nih.gov/policy/protecting-innovation.htm> or

Google: “NIH protecting U.S. biomedical”.

(Please help us thank NIH: “Do you find this page helpful?” – remember to click “yes” at the bottom of the page!)

2. Breakout Rooms: Discuss best practices, challenges, and questions. Cover four activities per Room.

3. Reconvene and summarize in the larger group!



Conflicts of Interest

Subcommittee Wrap-Up

1. Slides and notes will be posted on the FDP web site.
2. Please sign up for (A) Subcommittee Listserv and (B) COC Working Group!

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