

**Subject:** Conflict of Interest & Commitment Reminder (June 2020)

Dear University Community –

Below, please find a general reminder of the University’s conflict of interest and commitment requirements for Research Investigators, University Staff and University Administrators. If you have any questions, please do not hesitate to contact the Conflict of Interest Office at [coi@arizona.edu](mailto:coi@arizona.edu) or by phone at 520-626-6406.

### **Individual Conflict of Interest in Research Policy**

All **Investigators** are required to disclose their significant financial and personal interests and their sponsored and non-sponsored research projects to the COI Office. An Investigator is “any person who is responsible for the design, conduct or reporting of Research.” This includes all persons who are responsible for the design, conduct or reporting of Research regardless of their title, employment status and percentage of effort. While this may include students, trainees, collaborators, volunteers and consultants if those individuals have some degree of independence in performing some aspect of the design, conduct or reporting of the Research, it does not include individuals whose performance is purely ancillary or occurs solely under immediate supervision.

Investigators are required to do the following:

1. **Training:** Complete the Conflict of Interest Required Disclosure Training once every four (4) years or more frequently as directed by the COI Office.
2. **Outside Interests:** Submit a COI disclosure listing your Significant Financial Interests and Significant Personal Interests as those terms are defined in the University’s [Individual Conflict of Interest in Research Policy](#). If you do not have any Outside Interests, you must submit a COI disclosure certifying that you do not have any such interests. COI disclosures should be submitted using the University’s electronic [COI Disclosure System](#).

*Any payment, reimbursement, travel support or other compensation, of any amount, that an individual has personally received, or will personally receive, from a foreign entity must be disclosed as an Outside Interest in their COI Disclosure. Investigators should carefully follow the new and evolving guidelines from federal agencies regarding the identification of all sources of research support.*

3. **Research Projects:** Submit a project questionnaire for each non-sponsored and sponsored research project, if you have disclosed an Outside Interest. If a research project/protocol has not been automatically linked to your disclosure, you must manually add that research project/protocol to your COI disclosure.
4. **Recertify:** Recertify your COI disclosure (1) when you acquire a new Outside Interest, (2) when there are changes to a disclosed Outside Interest, and (3) annually between June 1 and June 30.

**Conflict of Commitment Policy**

The University's [Conflict of Commitment Policy](#) requires full-time (0.50 FTE or greater) **University Staff** to request approval for any **Outside Professional Commitments** or **Outside Employment**. Approval should be sought from your supervisor or, in the case of faculty, from your department head and dean by submitting an electronic [Conflict of Commitment Form](#).

*Any payment, reimbursement, travel support or other compensation, of any amount, that an individual has personally received, or will personally receive, from a foreign entity must be disclosed as an Outside Interest in their COI Disclosure. Investigators should carefully follow the new and evolving guidelines from federal agencies regarding the identification of all sources of research support.*

### **Institutional Conflict of Interest Policy**

All **University Administrators** are required to disclose their financial interests to the COI Office. A University Administrator is any individual in a position of administrative leadership of a recognized University college, academic department, business, or other administrative unit, where a regular job requirement is to make institutional decision on behalf of the University. The role of a University Administrator includes, but is not limited to, the following positions (whether such positions are staffed on an interim, full-time, or part-time basis):

- University Vice/Associate/Assistant Presidents
- University Provost and Vice/Associate/Assistant Provosts
- University Deans and Vice/Associate/Assistant Deans
- University Directors
- University Department Heads/Chairs
- University Business Officers/Managers
- University Division Chiefs, Center Heads/Directors
- University employees with the authority to sign agreements on behalf of the University of Arizona
- Individuals who serve as Chairs on the University's Institutional Review Board committees, regardless of whether such individuals are employees of the University

**University Administrators must disclose their Significant Financial Interests** at the time of initial appointment, and thereafter annually during the month of reappointment, and within thirty (30) days of the existence of any new Significant Financial Interest. (Significant Financial Interest is defined in the University's [Institutional Conflict of Interest Policy](#).) These disclosures should be submitted using the University's electronic [COI Disclosure System](#).

To receive announcements, updates and reminders from the COI Office, you can subscribe to our listserv here: <https://list.arizona.edu/sympa/info/coi-coc>.

Sincerely,

**Taren M. Ellis Langford**  
Director, Conflict of Interest

The University of Arizona  
1618 E. Helen St | P.O. Box 210409  
Tucson, AZ 85719  
Phone: (520) 626-8266  
Website: [Conflict of Interest Program](#)