



Title	RES - Conflicts of Interest in Research				
Region	Carle Health Central - BroMenn, Carle Health Central - Eureka, Carle Health East, Carle Health South, Carle Health West - Methodist, Carle Health West - Pekin, Carle Health West - Proctor				
Scope	All Entities				
Document type	Policy & Procedure				
Owner	Kathy Dams (Dir - Grants Admin&Research Op)				
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Approver(s)	APM Administrators, Jennifer Eardley (VP, Research)				
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Attachments

- [A - Research Conflict of Interest Disclosure Statement for Carle Researchers](#)
- [B - Research Conflict of Interest Disclosure Statement for Non-Carle Researchers](#)

Purpose/Scope

- A. To ensure that personal financial interests do not create a Conflict of Interest that improperly influences the exercise of Investigators’ professional duties and to ensure the integrity of research performed at Carle.

Definitions

- A. **Conflict of Interest** – Created when the institution as a whole or individual representative of the institution has or appears to have competing professional or personal obligations or personal or financial interests that would make it difficult for the institution or the individual(s) to fairly conduct and oversee a research project.
- B. **Carle Research Conflict of Interest Disclosure Statement** – The **Research Conflict of Interest Disclosure Statement** - Issued by the Foundation to elicit information regarding Conflicts of Interest, potential Conflicts of Interest, significant financial interests and potential Significant Financial Interests of Key Research Personnel.
- C. **Financial Conflict of Interest** – A Financial Conflict of Interest exists when the institution, through its designated official(s), reasonably determines that an investigator’s significant financial interest could directly and significantly affect the design, conduct or reporting of institution research.
- D. **Foundation** – Includes each affiliate, subsidiary and division of The Carle Foundation (“Carle”).
- E. **Institutional Official** – The individual designated as the Signatory Official on the FederalWide Assurance on file with the Office for Human Research Protections or his/her designee.
- F. **Institutional Responsibilities** – An Investigator’s professional activities on behalf of his/her Institution which may include teaching, administration, research, professional practice, and institutional committee memberships.
- G. **Investigator** – An individual who actually conducts a clinical investigation (i.e., under whose immediate direction the test article is administered or dispensed to, or used involving, a subject) or, in the event of an investigation conducted by a team of individuals, is the responsible leader of that team. [45 CFR 46.402, 21 CFR 50.3] When there may be more than one investigator at a site such as a Co-Investigator or Sub-Investigator, then an investigator should be designated as a Principal Investigator. However Co-Investigator(s) and Sub-Investigator(s) are key research personnel who have responsibilities similar to that of the Principal Investigator on a research project. While the Principal investigator has ultimate responsibility for the conduct of the research project, the Co-Investigator or Sub-Investigator is also obligated to ensure the project is conducted in compliance with applicable laws, regulations and policy governing research.
 - 1. **Co-Investigator** – An individual involved with the principal investigator in the scientific development or execution of the research study.
 - 2. **Sub-Investigator** – Any individual member of the clinical trial team designated and supervised by the investigator at a trial site to perform critical trial-related procedures and/or to make important trial-related decisions (e.g., associates, residents, research fellows).
- H. **Key Research Personnel** – Investigators and other individuals who contribute to the scientific development or execution of a research study or research project in a substantive, measurable way, whether or not they receive salaries or compensation directly from the funding source. These individuals participate in the conduct, reporting, supervision and management of human subjects research.
 - 1. Individuals who have minor roles in the research are not required to be listed on the IRB application and are not required to complete the training requirements. However, the Principal Investigator is responsible for ensuring that these individuals receive adequate training in accordance with their roles in the research.

- I. **Public Health Services (PHS)** – An operating division of the Department of Health and Human Services that includes the following operating divisions: Agency for Healthcare Research and Quality, Agency for Toxic Substances and Disease Registry, Centers for Disease Control and Prevention, Food and Drug Administration, Health Resources and Services Administration, Indian Health Service, National Institute for Health, the Substance Abuse and Mental Health Services Administration, and the Offices of the Regional Health Administrators. References to PHS include organizational units within PHS that have delegated authority to award financial assistance to support scientific activities, e.g., Bureaus, Institutes, Divisions, Centers or Offices.
- J. **Research** – A systematic investigation, inquiry, or analysis designed to develop or contribute to generalized knowledge that will primarily benefit those beyond the study participants. Research includes activities that aim to test a hypothesis, discover or collate facts, principles, or effects, reach new conclusions, or reexamine information by the critical study of a subject or by a course of scientific inquiry. Research also encompasses basic and applied product development, activities for which research funding is available from a PHS component through a grant or cooperative arrangement, as well as any experiment that involves a test article and one or more human subjects.
- K. **Research Conflict of Interest Committee** – An Institutional committee at Carle that reviews any potential Conflict of Interest in Research. At a minimum this committee includes the, VP of Research, Corporate Integrity Officer, and Research Integrity Officer.
- L. **Significant Financial Interest** – A financial interest consisting of one or more of the following interests of the Investigator (and those of the Investigator’s spouse and dependent children) that reasonably appears to be related to the Investigator’s Institutional Responsibilities:
 1. With regard to any publicly traded entity, a Significant Financial Interest exists if anything of monetary value including but not limited to, salary or other payments or compensation for services (e.g., consulting fees or honoraria, equipment, retainers, etc.), received from the entity in the twelve (12) months preceding the disclosure and the value of any equity interest in the entity as of the date of disclosure, when aggregated, exceeds \$5,000. For purposes of this definition, remuneration includes salary and any payment for services not otherwise identified as salary (e.g., consulting fees, honoraria, equipment, paid authorship); equity interest includes anything of monetary value.
 2. With regard to any non-publicly traded entity, a Significant Financial Interest
 - a. exists if anything of monetary value is received from the entity in the twelve (12) months preceding the disclosure, when aggregated, exceeds \$5,000; or
 - b. when the Investigator (or the Investigator’s spouse or dependent children) holds **any** equity interest.
 3. With regard to intellectual property rights and interests that when aggregated exceeds \$5,000.
 4. In addition, when research is supported by PHS funding, any reimbursed or sponsored travel that is related to the Investigator’s Institutional Responsibilities that have not been paid for by a federal, state, or local government agency, an institution of higher education as defined at 20 U.S.C. 1001(a), an academic teaching hospital, a medical center, or a research institute that is affiliated with an institution of higher education, must also be disclosed.
 5. Significant Financial Interest **does not** include:
 - a. Salary, royalties or other remunerations paid by the employing Institution;
 - b. Income from seminars, lectures or teaching engagements sponsored by a federal, state, or local government agency, an institution of higher education as defined at 20 U.S.C. 1001(a), an academic teaching hospital, a medical center, or a research institute that is affiliated with an institution of higher education;
 - c. Income from service on an advisory committee or review panels for a federal, state, or local government agency, an institution of higher education as defined at 20 U.S.C. 1001(a), an academic teaching hospital, a medical center, or a research institute that is affiliated with an institution of higher education; **or**
 - d. Income from investment vehicles such as mutual funds and retirement accounts or other funds over which the Investigator does not exercise control.

Statement of Policy

- A. **Purpose of Disclosure:** A disclosed financial interest that is deemed a conflict is merely a situation that must be evaluated and, if feasible, managed jointly by the Investigator and Carle. However, an undisclosed significant financial interest cannot be properly addressed and carries with it the potential for sanctions.
- B. **Disclosure Requirement:** All Investigators must have on file a current COI Disclosure Statement. Investigators will be required to update the Disclosure Statement at least annually and within thirty (30) days after a new Significant Financial Interest is received or acquired (e.g. through purchase, marriage, or inheritance).
 - Investigators who are also employees of Carle are to use the electronic Conflict of Interest Disclosure form found in Lawson. Employees who do not have access to the electronic form, are to use the [A - Conflict of Interest Disclosure Statement](#).
 - Investigators who are not Carle employees are to complete [B -The Conflict of Interest Disclosure Statement for Non-Carle Researcher](#) .

Additional Requirements when Applying for PHS Funding

1. Prior to the submission of an application to the PHS agency for funding, Investigators must have an up to date disclosure of all Significant Financial Interests. Any new Investigator, who subsequent to the submission of an application to the PHS grantee or during the course of the research project, plans to participate in the project, must also disclose their Significant Financial Interests to the designated official at least annually during the period of the award. In addition, an updated disclosure of Significant Financial Interests must be updated within thirty (30) days of discovering or acquiring new Significant Financial Interests.
 2. Each Investigator who is participating in research under a subaward where the prime award originates from PHS, must submit an updated disclosure of Significant Financial Interests.
- C. **Review of Disclosures:** COI Statements with disclosures will be reviewed for potential conflicts. The Research Integrity Officer is responsible for review of the Disclosure Statements for research. As necessary, if a Conflict of Interest appears to exist, the Research Integrity Officer will review the potential conflict issue with the VP of Research and Corporate Integrity Officer for a determination of any conditions or restrictions, if any, that should be imposed to manage, reduce or eliminate the conflict of interest.
- D. **Conflict Management Options:** Possible conflict management options include, but are not limited to:
1. Public disclosure of all relevant information;
 2. For research involving human subjects, disclosure of Investigator financial interests directly to participants;
 3. Modification of any Research proposal or plan;
 4. Close monitoring of the research project by independent reviewers;
 5. Divestiture of relevant significant financial interests;
 6. Termination or reduction of involvement in the relevant research project;
 7. Severance of outside relationships that pose conflicts; and/or
 8. Implementation of measures and protective factors in the design of the study to minimize potential bias, such as multiple investigators, blinding, or objective endpoints.
- E. **Reporting Disclosures:** No expenditure of sponsor funding for research shall occur with respect to any research project for which the committee has determined that a management plan is required until all reporting requirements have been met. For any Significant Financial Interest requiring disclosure that is identified after the funding for the research is awarded, it will be determined whether a management plan is required and for PHS awards, whether a Financial Conflict of Interest exists. Additionally, each award year, Carle must provide the PHS funding agency an annual Financial Conflict of Interest report that addresses the status of the financial conflict of interest and any changes to the management plan for the duration of the project period. The annual FCOI report is due at the time of the progress report.
- F. **Training:** Investigators are required to complete Conflict of Interest training at least every four (4) years prior to engaging in any PHS funded research, and immediately under the following circumstances:
1. when Carle's Conflict of Interest in Research policy changes in a manner that affects Investigator requirements;
 2. when an Investigator is new to the institution; or
 3. when an Investigator is not in compliance with this policy or management plan.
- G. **Failure to Comply with this Policy:** The Investigator is ultimately responsible for making any necessary disclosures as required by this Policy and to follow any prescribed plan for the management, reduction, or elimination of an identified Conflict of Interest. Failure to do so shall be deemed a violation of this policy. PHS Investigators are also subject to the following procedures when financial conflict of interest is not identified or managed in a timely manner including: failure by the Investigator to disclose a Significant Financial Interest that is determined to constitute a Conflict of Interest; failure by Carle to review or manage such a Financial Conflict of Interest; or failure by the Investigator to comply with a Financial Conflict of Interest management plan. The following actions need to take place:
1. A management plan must be implemented that shall specify the actions that have been, and will be taken to manage the Financial Conflict of Interest going forward;
 2. Within 120 days of determination of noncompliance, Carle must complete a retrospective review of the Investigator's activities and the PHS funded research project to determine whether any PHS-funded research, or portion thereof, conducted during the time period of the noncompliance, was biased in the design, conduct, or reporting of the research.
 3. Following the completion of the retrospective review, the Financial Conflict of Interest report to PHS may be updated, and if bias is found, a mitigation report will be completed as well in accordance with PHS regulations.
- H. **Application of this Policy to Subrecipients:** For PHS sponsored research that involves subcontractors, subgrantees or subawardees (collectively "Subrecipients") at other institutions, Carle requires a written agreement from Subrecipients that establishes whether Carle's policy or the subrecipient shall apply to the Subrecipient's Investigators. In all cases, Carle must report to the PHS funding agency any Subrecipient Financial Conflicts of Interest prior to the execution of the subcontract or within sixty (60) days of identification of a new Financial Conflict of Interest by the Subrecipient or Carle that arises during the term of the subcontract. If the Subrecipient's policy is used, the Subrecipient must certify that its Financial Conflict of Interest policy is compliant with 42 CFR Part 50 Subpart F and 45 CFR Part 94 and will be responsible for ensuring that the Subrecipient institution and its Investigators comply with the federal regulations. Subrecipients must report to Carle as the awardee institution, any identified Financial Conflict of Interest within ten (10) business days from the management plan agreement with the Subrecipient's Investigator, but no later than forty-five (45) days after identification of the Financial Conflict of Interest by the Subrecipient. If Carle's policy is used, the Subrecipient must ensure that its Investigators submit the Investigator's Disclosure Form to Carle for review.

- I. **Public Accessibility:** The Institution will respond to a written request, within five (5) business days for information concerning any disclosed Significant Financial Interest that meets the following criteria:
1. that it has been determined to be a financial conflict of interest; and
 2. that it has been determined to be related to PHS Funding.
- The written request is to be addressed to the Office of Corporate Compliance identifying which PHS funded study for which information is sought.
- J. **Records Retention:** The Compliance Department will retain records relating to actual Conflicts of Interests for three (3) years after the date of submission of the final expenditures report for the award to which they relate, or until the resolution of any agency action involving those records, whichever is later. All reasonable measures will be employed to protect the confidentiality of the records.

Procedure N/A

Other Related Links As Applicable To Site N/A

References

- 42 CFR Part 50, Subpart F, Responsibility of Applicants for Promoting Objectivity in Research for which PHS Funding is Sought.
- 45 CFR Part 94, Responsible Prospective Contractors.

A - Conflict of Interest Disclosure Form

The Carle Foundation has long standing policies related to potential conflicts of interest regarding corporate disclosures, research integrity, and continuing education activities. Carle employees shall not engage in outside activities that create actual conflicts between their own interests and those of the Foundation or the employee's institutional responsibilities***.

Completion of this form satisfies your corporate disclosure in addition to disclosures required for research and continuing education activities. Conflict of interest administrators will review your reported activities to identify any actual or apparent conflicts. Should such a conflict exist, the administrators will either approve the activity without further action or will contact you to develop a conflict of interest management plan.

If you are a physician, activities you report on this form should be consistent with information reported to the Open Payments database (a.k.a. Sunshine Act) when the nature of the payment requires disclosure.

* Family members= Father, mother, brother, sister of you or a spouse, and/or any other relative living in the household

** Self-directed investment= Self-management and control of your investment portfolio

Note- This does not include investment interests in mutual funds and retirement accounts, as long as you or your family member do not directly control the investment decisions made in these vehicles.

*** Institutional Responsibilities = Any professional or job responsibilities that you complete on behalf of The Carle Foundation

****Commercial Interest= A commercial interest is any entity producing, marketing, re-selling, or distributing health care goods or services consumed by, or used on, patients. The Accreditation Council for Continuing Medical Education (ACCME) does not consider providers of clinical service directly to patients to be commercial interests- unless the provider of clinical service is owned, or controlled by, an ACCME-defined commercial interest.

Please circle the answer choice for each question and add accompanying details if required.

1. Reason for Disclosure
 - a. Annual Submission
 - b. Change in Financial or Non-Financial Interest

2. In the preceding twelve (12) months, have you received any compensation (i.e. salary, consulting fees, authorships, royalties) from any entity, other than The Carle Foundation, that appears to be related to your institutional responsibilities***?
 - a. YES
 - b. NO
 - i. If yes, please list the type of compensation, the name of the company(ies) from which you received compensation, and the status (ended, ongoing, yearly, etc) of that compensation arrangement.

3. In the preceding twelve (12) months, have **your spouse, domestic partner, and/or any family members*** received any compensation (i.e. salary, consulting fees, authorship, royalties) from any entity that does business with The Carle Foundation and/or appears to be related to your institutional responsibilities***?
 - a. YES
 - b. NO
 - i. If yes, please list the type of compensation, the name of the company(ies) from which you received compensation, and the status (ended, ongoing, yearly, etc) of that compensation arrangement.

4. In the preceding twelve (12) months, have you, your spouse, domestic partner, and/or any family members* had a self directed investment** interest or ownership interest in a **publically traded** company? Note: This does not include investment interests in mutual funds and retirement accounts, as long as you or your family member do not directly control the investment decisions made in these vehicles.
 - a. YES
 - b. NO
 - i. If yes, please list the name of the company(ies) in which you have a self -directed investment or ownership interest and whether that interest is valued at \$5,000 or more.

5. In the preceding twelve (12) months, have you, your spouse, domestic partner, and/or any family members• had a self directed investment *** interest or ownership interest in a **non-publically traded** company?

Note: This does not include investment interests in mutual funds and retirement accounts, as long as you or your family member do not directly control the investment decisions made in these vehicles.

a. YES

b. NO

i. If yes, please list the name of the company(ies) and who has the investment or ownership interest (self, spouse/partner or other).

6. In the preceding twelve (12) months, have you, your spouse, domestic partner, and/or any family members• received any income from any intellectual property rights or interests (i.e. patents or copyrights)?

a. YES

b. NO

i. If yes, please describe the intellectual property or interest.

7. Are you currently engaged in research at Carle or have been over the past 12 months? (This does not include individuals who are enrolled into a research study as participants.)

a. YES

b. NO

i. Is the research you are/were engaged with supported by a commercial interest*****?

a. YES

b. NO

If yes, are you personally receiving any financial payment or benefit, regardless of your role in research?

If so, please identify your role in the commercially sponsored research and the name of the company (companies) supporting the research.

ii. In the preceding twelve (12) months, have you applied for federal funding or are you currently engaged in research that is supported by the Public Health Service (PHS) through a grant or cooperative agreement? Examples include funding from the National Cancer Institute or any grant from the National Institutes of Health (NIH).

a. YES

b. NO

If yes, have you had any travel related to your institutional responsibilities paid or reimbursed by a sponsor? This does not include travel reimbursed by Carle, a federal, state, or local government, an institution of higher education, an academic teaching hospital, a medical center, or a research institute that is affiliated with an institution of higher education. If so, please list the purpose of the trip(s), sponsor's name, destination, and duration of trip.

8. Is there anything not covered in this disclosure that you believe might constitute a conflict of interest OR create the appearance of a conflict of interest related to non-financial interests or relationships? (i.e. membership on a governing board, involvement in a professional association, formal political affiliations, religious biases, personal relationships)

a. YES

b. NO

i. If yes, please describe:

9. Due to Carle's 340B program compliance requirements, we must track a prescribing provider's practicing locations. This includes both Carle locations (e.g. Hoopston, Carle Main, Richland, BroMenn, MTCH, etc) and non-Carle locations (Francis Nelson, Pavilion, Crawford Memorial/Robinson, Paris, etc). **For prescribing providers only:** Have you or do you plan to be employed

at and give medical care at another healthcare facility (Carle or non-Carle location) other than your primary practice location?

a. YES

b. NO

c. N/A

i. If yes, please provide description of employment and name of each facility. You do not need to include your primary practice location.

By submitting this form, I certify to the best of my knowledge that I have disclosed all information with respect to my financial or non-financial interests per Carle policies. I understand and acknowledge my obligation to submit a new disclosure statement within thirty (30) days of acquisition or discovery of a new financial or non-financial interest.

Printed Name

Date

Signature

Employee ID#

B - CARLE RESEARCH CONFLICT OF INTEREST DISCLOSURE FORM

Instructions: This form is to be completed in connection with The Carle Foundation Research Policy 103– Conflicts of Interest in Research. This form is to be used by researchers who are not Carle employees.

If you are an Investigator or other Key Research personnel involved in the design, analysis, conduct or reporting of the results of research that engage The Carle Foundation, its affiliates and subsidiaries, including Carle Foundation Hospital and Carle Physician Groups, you must disclose any significant financial interests and associations with an entity that might be affected by the research. Please remember that you also must disclose the financial interests of your family which includes your spouse or qualified domestic partner and dependent children.

Your answers to the following questions do not necessarily mean that any financial interest you list is improper or impermissible. **If there is any significant change in financial interests during the term of any research project, then a new Disclosure Statement must be submitted within thirty (30) days of the date of the acquisition or discovery of a significant change.**

After completing the form, **save a copy** to your local computer for your records. You will then need to email a copy of the saved form to Carle Research (ResearchCOI@carle.com).

Last Name: _____ First Name: _____

E-mail: _____

Organization: _____ Department: _____

Date: _____

Reason for Disclosure:

- Initial Submission
- Annual Submission
- Change in Significant Financial Interest (must be reported within **thirty (30)** days of acquisition or discovery)

A. Disclosure of Significant Financial Interest

Please fill out a new Disclosure Statement each time you become aware of a Significant Financial Interest.

1. Do you (or a member of your family) have any of the following interests that reasonably appear to be related to your Institutional Responsibilities?

(a) Do you (or a member of your family) have an equity interest in a publicly traded company that at the time of this disclosure is greater than \$5,000?

- Yes No

If yes, please explain.

(b) Have you (or a member of your family) received any compensation from an entity (other than your place of employment) in the twelve months preceding this disclosure that when aggregated (including any equity interests), exceeds \$5,000 (compensation would include salary, consulting fees, honoraria, paid authorship)?

Yes No

If yes, please explain.

(c) Do you (or a member of your family) have an ownership interest in a non-publicly traded entity?

Yes No

If yes, please explain.

(d) In regards to a non-publicly traded company, have you received any compensation in the twelve (12) months preceding the disclosure, when aggregated, exceeds \$5,000?

Yes No

If yes, please explain.

2. Do you (or a member of your family) have any intellectual property rights and interests (e.g., patents, copyrights), income from such rights (unless from your Institution) that could reasonably appear to affect your Institutional Responsibilities including your research?

Yes No

If yes, please explain.

3. Is there anything not covered in this questionnaire that you believe might constitute a conflict of interest or create the appearance of a conflict of interest related to your Institutional Responsibilities including you research?

Yes No

If yes, please explain.

4. Have you applied for federal funding from the Public Health Service or will be engaged in research that is supported by the Public Health Service through a grant or cooperative agreement. Examples would include funding under a cooperative agreement from the National Cancer Institute or any grant from the National Institutes of Health.

No Yes If yes, please answer the following question.

In the past twelve (12) months, have you been reimbursed or received sponsorship for any travel related to your Institutional responsibilities that did not come from a federal, state, or local government agency, an Institution of higher education as defined at 20 U.S.C. 1001(a), an academic teaching hospital, a medical center, or a research institute that is affiliated with an Institution of higher education? You may also include any prospective travel that is currently planned.

No Yes

If yes, please list the purpose of trip, sponsor/organizer, destination, and duration (if not already reported).

B. Investigator's Affirmation

I hereby affirm that to the best of my knowledge, the information supplied in this form is complete and accurate as of the date listed above. I understand and acknowledge my obligation to submit a new Disclosure Statement within thirty (30) days of acquisition or discovery of a new Significant Financial Interest.