

# Conflict of Interest Program

For Investigators, Research Administrators,  
and UA Administrations

Supporting research and innovation by facilitating oversight and ensuring compliance with federal, university, and sponsors' conflict of interest requirements.

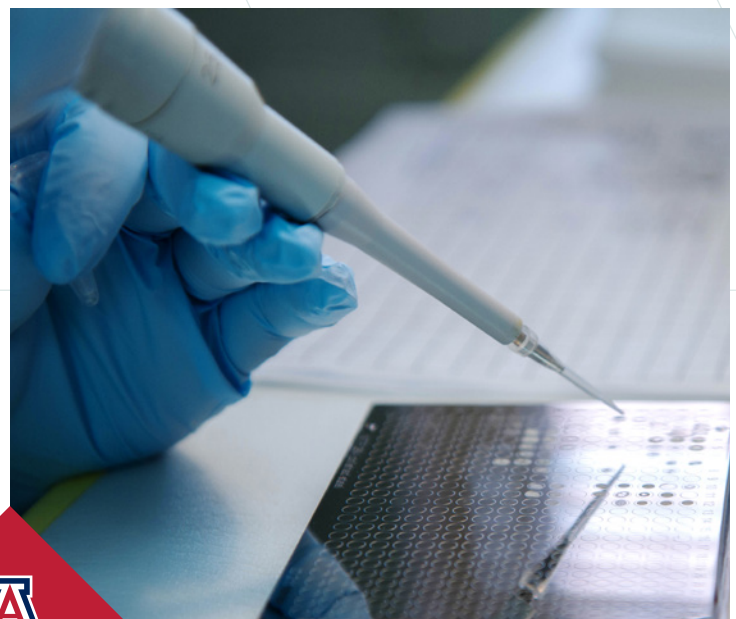
## WHAT WE DO

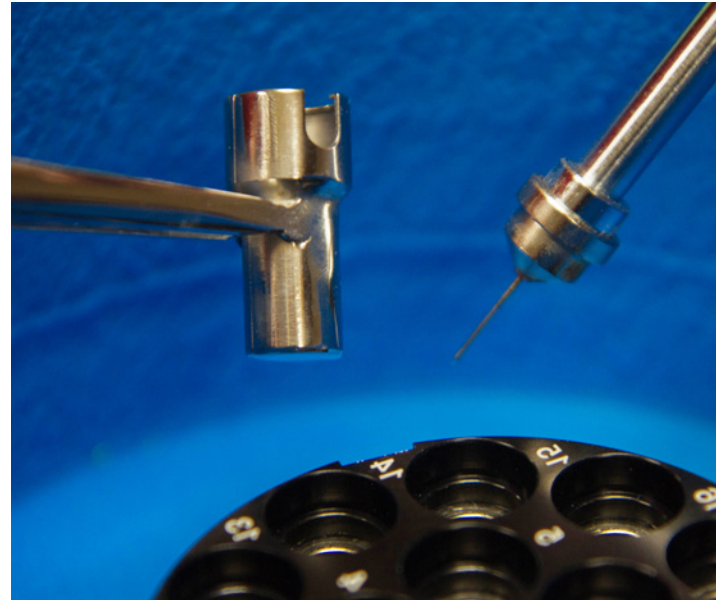
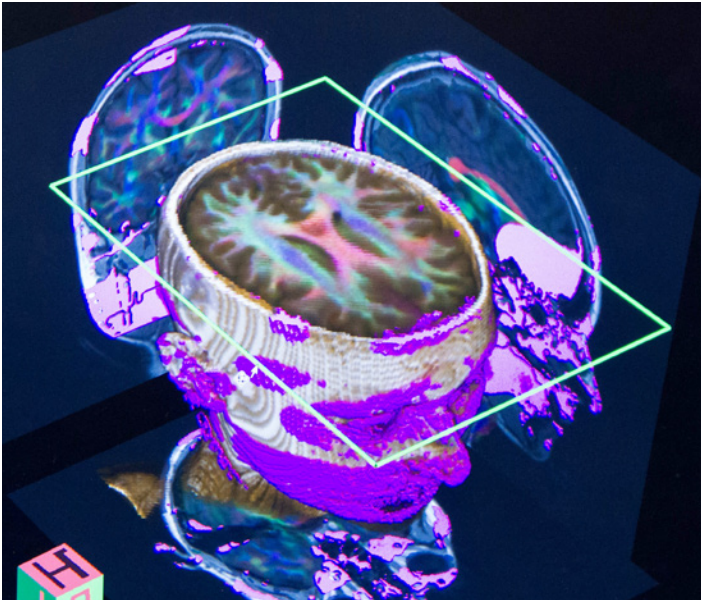
The Conflict of Interest (COI) program is responsible for enforcing:

1. Individual Conflict of Interest in Research Policy which identifies and manages financial conflicts of interest in order to protect the integrity of research;
2. Conflict of Commitment Policy which relates to an individual's distribution of time and effort between his or her full-time duties as a University employee and his or her responsibilities resulting from an outside activity;
3. Institutional Conflict of Interest Policy which identifies and manages institutional conflicts of interest in order to protect the credibility and integrity of research.

## SERVICES WE OFFER

- Help UA entrepreneurs manage start-up activities and institutional responsibilities
- Provide conflict of interest training
- Collaborate with researchers to protect the integrity of UA research
- Work with undergraduate and graduate students, postdoctoral researchers, and other University trainees to inform them of identified conflicts of interest
- Support Sponsored Projects & Contracting Services compliance requirements





## COI PROGRAM POLICIES

### 1. Individual Conflict of Interest in Research Policy

- The ICOIR Policy focuses on the relationship between your outside interests and research
- Outside interests include significant financial and personal interests held by you, your spouse or domestic partner, or your dependent children
- Your disclosure must be updated:
  - within 30 days of the acquisition of a new interest
  - annually even if there is nothing new to report
  - for each new project, including new proposals submitted through Sponsored Project Services, new or continuing awards, new non-sponsored projects, and new IRB protocols

### 2. Conflict of Commitment Policy

- The COC Policy requires Full Time (generally 0.5+ FTE) appointed personnel to request approval for any outside professional commitments or outside employment
- If you do not engage in an outside activity, you do not need to submit a COC form
- Approval should be sought from your supervisor or, for faculty, your department head and dean
- COC approval requests are submitted online at <https://uavpr.arizona.edu/COC>

### 3. Institutional Conflict of Interest Policy

- If you hold a leadership position (e.g. Director, Head, Dean, etc.), you must comply with the ICOI Policy. In particular, you are required to disclose significant financial interests at the time of your appointment. Additionally, you must:
  - update your disclosure annually
  - update when you acquire a new significant financial interest
  - update whenever you become aware of additional significant financial interest of the university.
- The Conflict of Interest disclosure system can be accessed at <https://uavpr.arizona.edu/COI>.

## ADDITIONAL RESOURCES

- COI Disclosure Database <https://uavpr.arizona.edu/COI>
- Individual Conflict of Interest in Research Policy <http://policy.arizona.edu/research/individual-conflict-interestresearch>
- Conflict of Interest Program Homepage
- What is Conflict of Commitment and how is it different? [https://rgw.arizona.edu/sites/researchgateway/files/coc\\_v\\_icoir\\_comparison\\_table.pdf](https://rgw.arizona.edu/sites/researchgateway/files/coc_v_icoir_comparison_table.pdf)
- We encourage you to visit the Research Gateway for our list of frequently asked questions about the following topics:
  - Disclosures of Outside Interests
  - COI Disclosures for Human Subjects Research
  - Consulting Agreements