Conflicts of Interest

What is a Conflict of Interest (COI)?

Conflicts of interest are circumstances that create a risk that professional judgements or actions regarding a primary interest will be unduly influenced by a secondary interest.

Primary Interests include promoting and protecting the integrity of research, the quality of medical education, and the welfare of patients. Secondary Interests may include financial interests, pursuit of professional advancement and recognition, or the desire to do favors for friends, family, students, or colleagues.

Conflicts of interest can take many forms, including but not limited to clinical conflicts, research protocol-specific conflicts, Financial Conflicts of Interest (FCOI) specific to NIH grants, gifts and entertainment, self-dealing, adverse interest in a supplier or competitor, usurping corporate opportunities, and intellectual bias.

Why does COI management matter? What are the risks?

Patients and the public benefit when different players in the healthcare industry collaborate to coordinate care and develop new products for treatment. It is beneficial for SIU SOM when faculty and employees are viewed as experts and have opportunities to appropriately collaborate with industry.

However, secondary interests can unduly influence professional judgment or create bias, threatening the integrity of research, the quality of patient care, the objectivity of professional education, and the public’s trust in medicine. Additionally, some opportunities may be kickbacks in disguise. There are many recent news stories about conflicts of interest that were not disclosed, or that potentially affected professional judgment, or that appeared to use business situations to personally benefit individuals.

Both Federal and Illinois state laws have COI implications, including but not limited to the Anti-Kickback Statute, Stark Law, Physician Payment Sunshine Act, HHS and FDA Human Subject Protection regulations, FCOI regulations, IL University Faculty Research and Consulting Act, IL Governmental Ethics Act, and IL State Officials and Employees Ethics Act.
What about Conflicts of Commitment?

A conflict of commitment arises when the external activities, whether compensated or not, of an SIU SOM employee are so demanding of time or attention, or are so closely related to the employee's SIU work, that they interfere with the individual's primary responsibilities to the SIU SOM. Conflicts of commitment must also be disclosed for review and management through the COI process.

What should I do with my potential COI? Disclose it!

If you have a potential COI, you must disclose it so that it can be reviewed by the COI administrative team, and if appropriate, be managed.

Examples of potential COI that should be disclosed include:

- Consulting
- Research outside SIU
- Secondary employment/adjunct faculty appointments
- Ownership interests in competitors or vendors of SIU
- Honoraria for presentations, speaking engagements
- Remuneration (gifts, conference fees, travel) from outside SIU
- Grant or manuscript review
- Board membership

All paid activities or unpaid activities involving industry must be approved PRIOR to activity commencement. Unpaid activities should be reported within 30 days of activity commencement. Activities started without preapproval may be rejected and may leave the requestor subject to discipline.

Disclosures are made through the iRIS COI Module: https://siu.imedris.net. Directions for submitting an annual disclosure or updating the annual disclosure with intermittent disclosures are found https://siumed.edu/compliance.

How will my potential COI be reviewed and managed?

A team that includes compliance, legal, faculty liaisons, and subject matter experts as needed, review disclosed COI to determine the activity's risk.

COI risk is assessed on a case-by-case basis, and includes consideration of the discloser's position/influence at SIU, the type of activity, the type of organization with whom the discloser has the relationship, value of remuneration, time needed to perform activity, similarity in activity to role at SIU, etc.

If the potential COI is deemed low-risk, it will be “administratively approved” by Compliance, and the discloser will receive an email notification.

If the potential COI is deemed medium- or high-risk, a group including compliance, legal, faculty liaisons, and subject matter experts will discuss if the COI can be managed, and if so, how it can be managed. This information will be included in a COI Management Plan. The Plan will be discussed with the discloser and their Chair for discussion and approval. Management Plans for Faculty will be also be approved by the SOM Dean, pursuant to the University Faculty Research and Consulting Act.
Appeals to COI decisions/Management Plans will be brought before the Executive Compliance Committee, composed of senior leadership.

Questions? Want more information?

Office of Compliance and Ethics COI Resource page

Office of Compliance and Ethics
compliance@siumed.edu
217-545-4248

External Compliance Hotline and Online Reporting Tool- To report compliance concerns
1-800-910-6707
http://www.siumed.edu/compliance/reporting-suspected-compliance-issues-or-concerns.html