



## **2023 Best Practices Submission**

### **Presentation Title:**

Achieving a University-wide Conflict of Interest Program

### **Presenters:**

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### **Presentation Description:**

Whether you are contemplating starting a comprehensive conflict of interest disclosure program, or have one established, but are curious as to what others are doing to identify and manage conflicts of interest, this session will provide you with insight into Auburn University's COI program that has become a model for other institutions over the past 5 years. We will share our solution to centralize and manage conflict of interest challenges facing higher ed. This session will also provide an opportunity for others to comment on how they have created effective operations to identify and manage COIs. Leave with practical ideas to implement better business practices regarding COIs at your institution.

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### **Statement of the Problem:**

Our institution faced anonymous allegations of nepotism and did not have a mechanism to identify and manage potential conflicts of interest and conflicts of commitment (COI/COC). We had limited disclosure of related family members during the application process and limited disclosure of significant financial conflicts of interest for PHS researchers, but there was a huge void in disclosure and management of real, potential, or perceived COI/COC. Upper administration directed our Office of Audit, Compliance & Privacy to develop a solution.

### **Identify the Solution:**

We hired a conflict of interest compliance manager to work with the Office of Research compliance to develop our best practice solution. We surveyed other institutions to understand what they were doing and discussed issues and needs with key stakeholders at our institution. Taking into consideration our unique culture and structure, existing systems and procedures already in place, and the origin of our directive, we developed a process that would prove successful. We selected the most-cost effective solution by purchasing additional

licenses in an existing software to save the institution money and achieve buy-in from researchers and research administration. The impact was a university-wide conflict of interest disclosure program for nearly 6,000 employees and the implementation of almost 150 management plans. This has improved awareness and proactive action not only for our compliance division, but also numerous departments on campus. With a centralized COI operation, we have increased compliance with the State Ethics law, federal regulatory research requirements, and improved our culture of compliance and ethics university-wide. We have a 98% disclosure rate (will never achieve 100% because we add new employees on a weekly basis and they have 30 days to complete the disclosure).

#### **Implementation Timeline:**

1. March 2019 - developed conflict of interest policy for the institution
2. June 2019 - hired Conflict of Interest Compliance Manager (Kristin Roberts)
3. Summer 2019 - acquired additional licenses to the COI-Smart software; developed the COI questionnaire and built it in the COI System
4. Aug - Sept 2019 - campus communications regarding the new COI policy and upcoming disclosure process; created a website with FAQs and information about the policy and disclosure process; drafted template COI management plans for various anticipated conflicts; presented to campus groups (Faculty Senate, Administrative & Professionals Assembly, Staff Council; AUM campus)
5. October 2019 - launched initial COI questionnaire for all 6,000 full time employees to complete a disclosure
6. Oct - Dec 2019 - reviewed all COI disclosures and categorized as no conflict, need more information, potential COI, potential COC, etc.
7. Jan - May 2020 - contacted individuals with real, potential or perceived COI/COC to implement a management plan with their supervisor who would act as the oversight manager; Implemented nearly 40 management plans
8. Summer 2020 - prepare for upcoming disclosure period; revise questionnaire for improvement
9. Oct 2020 - launch year 2 questionnaire
10. Oct 2020 - May 2021 - communicate with employees and supervisors to implement necessary management plans (implemented an additional 50 management plans)
11. Summer 2021 - revise questionnaire to focus on foreign influence
12. July 2021 - launch year 3 questionnaire; adjusted disclosure period to coincide with academic year and hiring cycles, rather than fiscal year
13. Aug 2021 - April 2022 - review 6,000 disclosures and contact employees and supervisors to implement additional management plans
14. May 2022 - hire 2 student interns in prelaw program to assist with disclosure review, follow up, and drafting of management plans
15. July 2022 - launch year 4 questionnaire; changes to language of questionnaire to adhere to federal regulations
16. Aug - Dec 2022 - review disclosures and implement additional management plans
17. Jan 2023 - renew contract for 1 year and prepare for transition to new system in Fall 2023

**Benefits & Retrospect:**

The Conflict of Interest disclosure and management program has been well received by supervisors as well as employees. Having a centralized process has provided consistency among all the departments, colleges, and schools. We have gained greater knowledge of outside professional activities that may present a risk to the university and the individual, and have been able to provide proactive guidance and implement measures to reduce or eliminate risks created by these potential conflicts. The program has enabled better compliance with the Alabama State Ethics law, Nepotism Law, and Bid Laws, as well as compliance with federal research sponsor requirements regarding funded research. We have a 98% disclosure rate demonstrating the buy-in and effectiveness of the program. It has increased awareness of our office and encouraged employees to seek guidance proactively rather than engage in risky activities or turn down opportunities beneficial to the individual and the university. Several institutions have contacted us asking about our program and look to it as a gold-standard in the higher ed COI/COC industry. We always have room for improvement, but are very proud of what we have achieved in a relatively short period of time.