

Conflict of Interest

Institution

Investigator

IRB

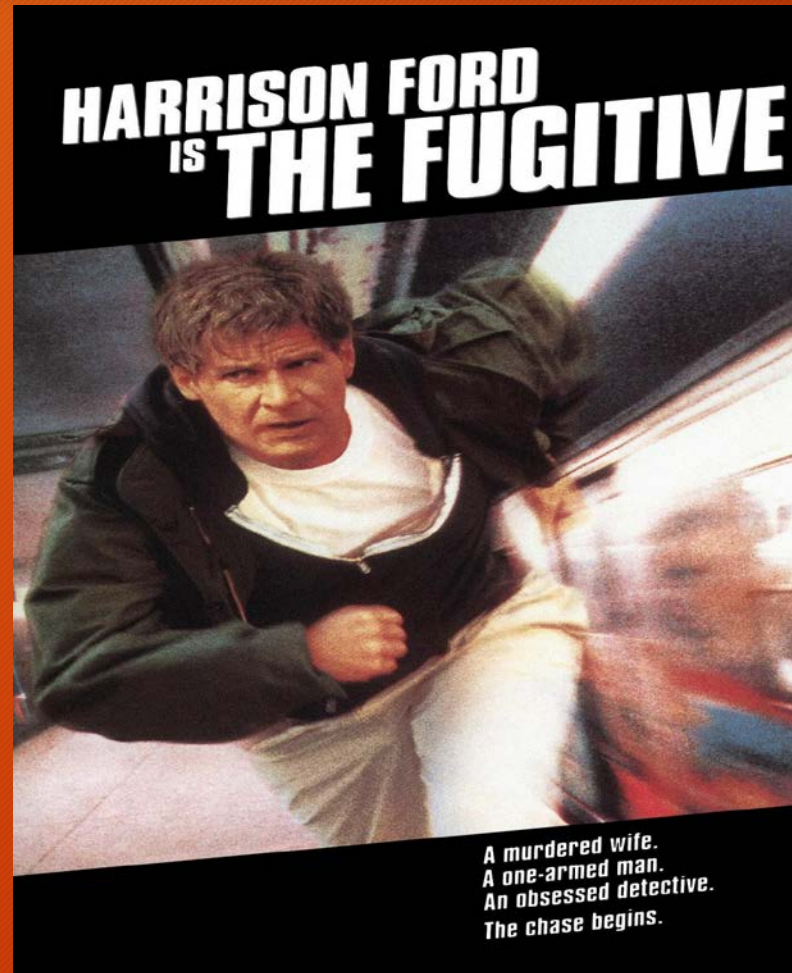
Deb Henninger MHA BSN RN CCRC
Associate Director
Office of Research Compliance

October 22, 2015

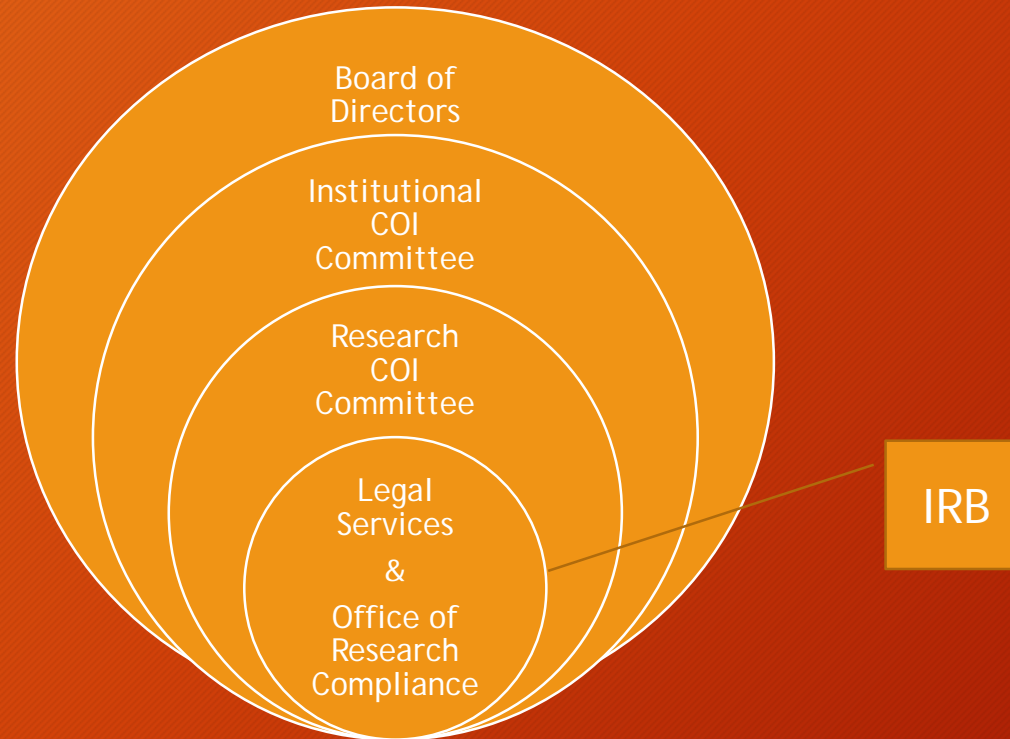
Potential Areas of Conflict

- Institutional
- Investigator
- IRB Member & Staff

The Face of Conflict ...



Geisinger Oversight of COI



Geisinger COI Policies & Guidance

- 09.100 - Conflicts of Interest Policy for Employees
- 14.400 - Policy for Investigator Conflicts of Interest in Research
- Guidance - IRB Members on Conflicting Interests



Responsibility to Disclose Financial Interests

- ✓ Disclose of all financial interests
- ✓ Complete Annual Conflict of Interest Questionnaire
- ✓ Acknowledge potential COI on transmittals, IRB and grant submissions
- ✓ Submit any significant changes in financial interests during the year
- ✓ Submit reimbursed travel throughout year
- ✓ CMS Open Payments

Travel Disclosures

- ✓ Must be reported within 30 days of the travel
 - ✓ Related to your Geisinger Professional Responsibilities
 - ✓ By you or a family member
 - ✓ Paid for or reimbursed by an outside source (profit or non-profit)
 - ✓ Exceptions: Government or academic institutions



How to Disclose Travel ...

- <https://geisinger.coi-smart.com/login.php>
- 2015 GHS Conflict on Interest Questionnaire
- Question 1: Financial Interests ...?
 - Purpose
 - Approximate dollar amount
 - Destination
 - Dates



Institutional Conflict

- Geisinger financial or business interests
 - Licensing, technology, patents
 - Investments
 - Gifts
 - Senior administrators' financial interests



Management Plans

- Developed with Investigator or responsible party
- Approved by Research COI Committee
- Accepted by Investigator/responsible party
- Reported to Geisinger COI Committee & Board
- Reported to IRB Manager & Staff
- Reported to IRB Committee
- IRB reviews Management Plan as relates to proposed research

IRB Member Conflicts to Consider

- Financial Interest
- Relationship to sponsor, investigator or study team
- Competition
- Research Participant



IRB Member Conflict

- Inform staff when assigned / review agenda
- Reassign review
- During IRB Meeting
 - Inform Chair
 - May remain in room during study presentation
 - Leave room or hang up during discussion/vote
- Minutes reflect “recusal”

