



Geisinger

Financial Conflict of Interest for Researchers - Refresher

*Research Quarterly Meeting
June 13, 2016*

Geisinger Conflict of Interest (COI) Policies

09.100 – COI Policy for Employees and Institutional Conflicts

09.200 – COI Policy for Directors, Officers and Senior Leaders

14.702 – Geisinger Policy on Financial Conflicts of Interest in Research



Investigator Responsibilities

- ✓ Disclose of **all** financial interests
- ✓ Complete Annual Conflict of Interest Questionnaire
- ✓ Acknowledge potential COI – PI, IRB and grant submissions
- ✓ Submit any significant changes in financial interests during the year (SFI)
- ✓ Submit reimbursed travel throughout year
- ✓ CMS Open Payments (Physicians)

SFI & Travel Disclosures

- ✓ Ongoing responsibility
- ✓ Must be reported within 30 days of occurrence
- ✓ By you or a family member
- ✓ Travel notes:
 - ✓ Related to your Geisinger Professional Responsibilities
 - ✓ Paid for or reimbursed by an outside source (profit or non-profit) ... directly to you

How to Disclose SFI & Travel ...

- Geisinger COI Smart - <https://geisinger.coi-smart.com/login.php>
- GHS Conflict on Interest Questionnaire
- Financial Interests ...?
 - If travel ...
 - Purpose
 - Approximate dollar amount
 - Destination
 - Dates



2015 Annual COI Questionnaire

- Physicians – Question #1
 - Links to CMS Open Payments
 - Review your CMS Open Payments file
 - Certify payments to you are accurate or appeal
- July 1 – August 31, 2016

2016 Research COI Questionnaire

- New researchers
 - Last 12 months
- Current investigators
 - Significant financial interests
 - Travel
 - Update within 30 days of occurrence
- Sept 1 - Dec 31, 2016

2017 Research COI Questionnaire

- New researchers
 - Last 12 months
- Current investigators
 - Significant financial interests
 - Travel
 - Update within 30 days of occurrence
- Available January 1, 2017

COI Training

- Every 3 years
- CITI Responsible Conduct of Research
- CITI Human Research Protection
- CITI IACUC