



INDIANA UNIVERSITY

OFFICE OF THE VICE PRESIDENT FOR RESEARCH

Office of Research Compliance

October 25, 2012

University Faculty Council
Ballantine 010
1020 E. Kirkwood Ave
Bloomington, IN 47405

RE: Indiana University Policy on Financial Conflict of Interest in Research

The Bloomington Conflict of Interest Committee met on September 27, 2012, the first committee meeting of the 2012-2013 academic year. During the committee meeting there was a lengthy discussion regarding the University's new conflict of interest requirement that anyone involved in the design, conduct or reporting of research disclose any travel sponsored or reimbursed by an outside entity. This new University requirement was created because of changes in Public Health Service (PHS) regulations regarding financial conflicts of interest (COI). The PHS now requires PHS-funded researchers to disclose to the institution travel sponsored or reimbursed by an outside entity through the annual disclosure process and within 30 days of a new trip that has not previously been disclosed.

During the IU policy revision process last year the new requirement was also applied to all investigators, not just PHS funded investigators. In the past week NIH has clarified that it is appropriate to apply a \$5000 threshold to the reporting requirement and family members' travel (spouse, domestic partner, and dependent children) as well (<http://grants.nih.gov/grants/guide/notice-files/NOT-OD-13-004.html>), but the changed IU policy (<http://www.iu.edu/~ufc/docs/policies/COI12.pdf>) states that "Any reimbursed or sponsored travel, related to an Investigator's University Responsibilities" must be reported, with no minimum threshold.

After implementing the new IU policy the committee has determined that this requirement is creating considerable additional work for faculty and administrative staff members with little to no obvious benefit to the University and no systematic process by which to assess data quality. Developing a database infrastructure to allow efficient storage and access to these data would require significant IT resources and development.

The Bloomington COI committee would like to suggest a change in University policy, namely that the requirement to report travel as part of the research related conflict of interest disclosure merely stay consistent with PHS regulations, rather than the specific requirement to report all travel. In effect this would currently introduce the \$5000 threshold, but would also include any future revisions to PHS, avoiding potentially repeated future changes to the IU policy.

The Bloomington COI committee is willing to work with the relevant administration to discuss this proposed change to the IU policy on Financial Conflicts of Interest in Research and provide any relevant information necessary to make a final determination.

Regards,

T. Rowan Candy PhD
IUB COI Committee Chair