




OPTIMIZING A CONFLICT OF INTEREST, CONFLICT OF
COMMITMENT, and OUTSIDE ACTIVITIES FOR PAY
REPORTING PROCESS

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DIFFERENCES AND SIMILARITIES OF COI, COC, AND OAP

- ❖ CONFLICT OF INTEREST
- ❖ CONFLICT OF COMMITMENT
- ❖ OUTSIDE ACTIVITIES FOR PAY

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POLLING QUESTION #1

How does your organization define a conflict of interest (COI)?

- A. Federal funding agency definition
- B. State law/regulatory definition
- C. Institutional definition
- D. Combination of the above
- E. Depends on the facts

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DIFFERENCES AND SIMILARITIES OF COI, COC, AND OAP

Institutional Conflict of Interest: A situation in which the financial interests of an institution or an institutional official, acting within his or her authority on behalf of the institution, may affect or appear to affect the research, education, clinical care, business transactions, or other activities of the institution.

Conflict of Interest: A conflict of interest or an appearance of a conflict exists when a reasonable person would conclude from the circumstances that the employee's ability to protect the public interest, or perform public duties, is compromised by a personal, financial, or business interest. An appearance of conflict can exist even in the absence of an actual/legal conflict of interest. All employees are referred to State Conflict of Interest Statutes O.C.G.A. § 45-10-20 through § 45-10-70 and institutional policies governing professional and outside activities.

Conflict of Interest: any situation in which (a) the personal or outside interests of a Covered Individual, including his/her Immediate Family members, prevents or appears to prevent the individual from making an unbiased decision with respect to Institutional Responsibilities; or (b) it reasonably appears that a Significant Financial Interest could affect the design, conduct, or reporting of activities funded or proposed for funding by a sponsor. All Covered Individuals shall make every effort to avoid even the appearance of a conflict of interest, which is when a reasonable person would conclude from the circumstances that an individual's ability to protect the Enterprise's interest, or perform Enterprise duties, is or could be compromised by a personal, financial or business interest.

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POLLING QUESTION #2

How does your organization define a conflict of commitment (CoC)?

- A. Federal funding agency definition
- B. State law/regulatory definition
- C. Institutional definition
- D. Combination of the above
- E. Depends on the facts

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DIFFERENCES AND SIMILARITIES OF COI, COC, AND OAP

Conflict of Commitment: Situations in which non-Augusta University activities interfere with the regular and punctual discharge of an employee's official duties.

Conflicts of Commitment: A USG employee shall not engage in any occupation, pursuit, or endeavor that will interfere with the regular and punctual discharge of that employee's official duties.

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POLLING QUESTION #3

How does your organization define outside activities for pay?

- A. Payment for services provided outside normal duties (for employer)
- B. Payment for services provided to an external entity
- C. Payment for consulting
- D. Payment for publishing/textbook/editorial boards
- E. Payment for research efforts

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DIFFERENCES AND SIMILARITIES OF COI, COC, AND OAP

- **Honoraria:** Any payment(s) given for professional or voluntary services that are rendered nominally without charge, and any payments in recognition of these services typically forbids a price to be set. See Board Policy 8.2.18.4 Gratuities for guidance on accepting expense reimbursement from outside parties. For AU, an honorarium of more than \$1000 (per day) will be considered compensation.
- **Outside Activity - Compensated:** Such activities include consulting, teaching (credit or non-credit), speaking, and participating in business, professional, or service enterprises with external entities. Payments and expense reimbursement from governmental agencies such as the State of Georgia or the Federal Government are excluded and not considered outside compensation. Likewise, payments from AU (such as for continuing education) or one of our affiliated organizations (such as AUHealth) are not considered outside compensation.

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COMMON ROADBLOCKS AND INEFFICIENCIES

- ❖ CONFLICT OF INTEREST
- ❖ CONFLICT OF COMMITMENT
- ❖ OUTSIDE ACTIVITIES FOR PAY

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POLLING QUESTION #4

What is your role in the COI Disclosure Review Process?

- A. Oversight of the Program
- B. Reviewer of Disclosures – all
- C. Reviewer of Disclosures – research related only
- D. Committee Support
- E. None/only my personal disclosures

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POLLING QUESTION #5

What is your role in the Conflict of Commitment review process?

- A. Oversight of the Program
- B. Review and approve commitments of my department/division
- C. Review and approve commitments of my direct reports
- D. HR/time reconciliation
- E. None

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POLLING QUESTION #6

What is your role in the review of outside activities for pay (OAP)?

- A. Oversight of the Program
- B. Review and approve OAP for my department/division
- C. Review and approve OAP of my direct reports
- D. HR/time reconciliation
- E. None

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COMMON ROADBLOCKS AND INEFFICIENCIES

- Definitions
- Requirements
- Communication
- Purposes

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COMMON ROADBLOCKS AND INEFFICIENCIES

- Reviews
- Timing
- Enforcement
- Accountability

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COORDINATED REPORTING FOR THE END USERS AND REVIEWERS

- ❖ CONFLICT OF INTEREST
- ❖ CONFLICT OF COMMITMENT
- ❖ OUTSIDE ACTIVITIES FOR PAY

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COORDINATED REPORTING FOR THE END USERS AND REVIEWERS

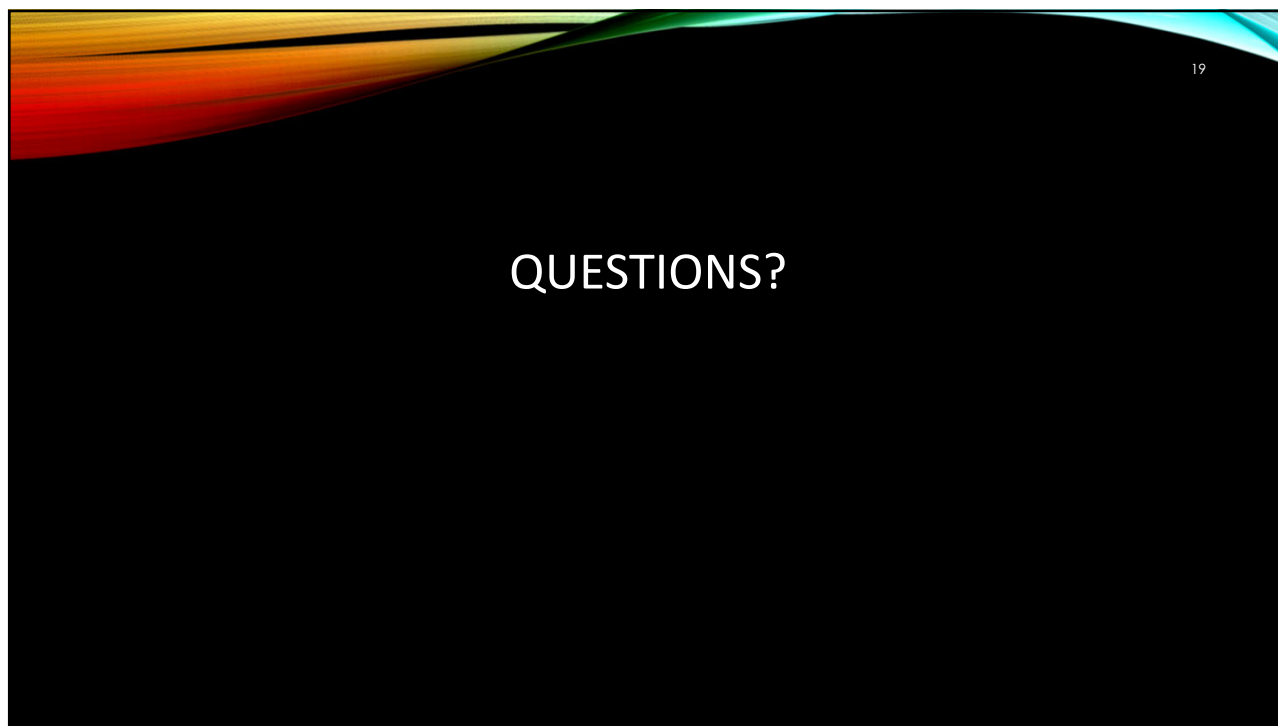
- ❖ Review Requirements
- ❖ Review Purposes
- ❖ Discover Synergies

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COORDINATED REPORTING FOR THE END USERS AND REVIEWERS

- ❖ Electronic Submission(s) and Reviews
- ❖ Refine Questions and Create Logic
- ❖ Coordinate Submission Timing

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