

Conflict of Interest and Commitment

Faculty and Staff

Policy Revision Summary effective July 1, 2009

Gifts and Contributions

- **NO GIFTS, of ANY amount**, may be accepted by individuals from suppliers of pharmaceuticals, medical equipment and devices, or medical service vendors or their agents. (There is an exception for certain unrestricted gifts which may be accepted through the Development Office).
- Types of activities viewed as gifts include (with some exceptions) food, travel, tickets to entertainment events, ghostwriting services and promotional items.

Specific Requirements for Federally-Regulated Research and Projects (NSF, PHS and FDA)

- The federal regulations for handling financial conflicts of interest have been outlined in more specific detail in the revision.

Healthcare Industry Sponsored Activities

- Personnel may not be able to receive compensation or consulting payments of a guaranteed amount for talks supported directly by suppliers of pharmaceuticals, medical equipment and devices or medical services, if certain criteria exist.
- Personnel may not receive compensation or consulting payments for Health Care Industry sponsored promotions or lectures on the use of drugs or devices for unapproved indications (off-label), not approved by the FDA, and sold by the same Healthcare Industry vendor.
- Personnel may not receive compensation or consulting payments for grants or contracts to conduct Health Care Industry sponsored research on unapproved indications (off-label) of drugs or devices while receiving payments for lecturing and/or consulting from the same Healthcare Industry company.
- Personnel may not receive compensation or consulting payments for listening to sales talks or simply attending a CME or other activity.
- Personnel may not receive compensation or consulting payments for prescribing medications or changing a patient's prescription.
- Personnel may not receive compensation or consulting payments without associated duties. All consulting or service activities must follow University guidelines relating to consulting and may accept only fair market compensation for specific, legitimate services provided to industry with payment commensurate with time and effort.



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Conflict of Commitment Guidelines for Faculty

- Full-time faculty appointed on a 9 month basis should not expend more than 40 days per academic year (including holidays) on external activities.
- Full-time faculty appointed on a 12 month basis should not expend more than 50 days per academic year (including holidays) on external activities.
- For those academic year faculty receiving external funding during the summer months (currently June, July, and August), the policy for full-time faculty appointed on a twelve-month basis will apply – i.e., no more than fifty days per year, including holidays.

Important Links

Conflict Disclosure System (*for non-SOM Faculty*)

- <https://webapp-a.mis.vanderbilt.edu/coi/>

Conflict Disclosure System (*for SOM Faculty*)

- <https://www.mc.vanderbilt.edu/medschool/FOTO>

Copies of New Policy (effective July 1, 2009); **Vendor Listing**; **Policy Revision Summary**; **Talking Points**; **FAQs**

- <http://www.vanderbilt.edu/compliance>

No Solicitation Policy

- <http://hr.vanderbilt.edu/policies/hr-039.pdf>

For Assistance

Please contact coi@vanderbilt.edu