Financial Conflict of Interest

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Process for Faculty & Staff

- Take FCOI training once every 4 years via TrainTraq
- Disclose and Certify any FCOIs annually.
  - Disclosure is done via MAESTRO.
- At time of new award at SRS, they must list all investigators on the project. This is NOT redoing their annual disclosure.

Definition of Key Personnel -

The project director or principal investigator and any other person, regardless of title or position, who is responsible for the design, conduct or reporting of Research or Research Activities. The term investigator does not include students unless a student receives compensation from a member for the student's research efforts (e.g., scholarship, salary or tuition reimbursement).

****ALL Graduate Students working on a sponsored project are required to take the training and do the annual disclosure.****
What is a potential FCOI?

- An equity interest that when aggregated for the Investigator and the Investigator’s spouse and dependent children, exceeds $5,000 in value as determined through reference to public prices or other reasonable measures of fair market value.

- Salary, royalties or other payments that, when aggregated for the Investigator and the Investigator’s spouse and dependent children over the next 12 months, are expected to exceed $5,000.

- Reimbursed or sponsored travel related to institutional responsibilities which exceed $5,000 in value as determined through reference of purchase price or other reasonable measures of fair market value.

FCOI does not include:

- Salary, royalties, or other remuneration from the A&M System;

- Income or travel from seminars, lectures, or teaching engagements sponsored by public or nonprofit entities;

- Income or travel from service on advisory committees or review panels for public or nonprofit entities. (i.e. federal/state agencies; commodity groups)

External Employment

- Review of all Ag-406 - Request for Consulting & Outside Professional Employment for Faculty and Extension Agents

- If FCOI is a potential, an email is sent to the PI making sure they are aware of the rule and letting them know to contact me if they have questions.
What happens in cases of FCOI?

- **Review of Disclosure**: Upon notification of an approved award, SRS shall forward all pertinent information to the AgriLife Risk and Compliance Office, who will conduct an initial review of all financial disclosures.

- **Initial Determination**: If the initial determination is that there may be a potential conflict of interest, the investigator will be notified and the Disclosure packet will be forwarded to the Conflict of Interest Review Committee.

- **Committee Members and Chair**: Committee members and chair are appointed by the Research Compliance Officer.

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**Regulations & Rules**

**TAMUS Regulations**
- System Regulation 15.01.03, Financial Conflicts of Interest in Research

**AgriLife Extension**
- Rule: 15.01.03.X1 - Financial Conflicts of Interest in Sponsored Research

**AgriLife Research**
- Rule: 15.01.03.A1 - Financial Conflicts of Interest in Sponsored Research

**Veterinary Diagnostic Lab**
- Rule: 15.01.03.V1 - Financial Conflicts of Interest in Sponsored Research

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**QUESTIONS??**
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