

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.

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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.****

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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.

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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)

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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.

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What happens in cases of FCOI?

- o *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.
- o 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.
- o 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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