

CoI Disclosure Approvers' Guidance- Department Chairs

The CoI disclosure in eCol includes the reporting of outside activities, significant financial interests and related research (if any), providing information for both Conflict of Commitment and Conflict of Interest reviews.

- A **conflict of commitment (CoC)** exists when the external activities of an OHSU faculty member substantially interfere with the individual's responsibilities to the unit to which the individual is assigned, to students, or to the university (e.g. time, attention, commitment).

- A **conflict of interest (CoI)** exists when an OHSU employee's financial interests or other obligations interfere, or appear to interfere, with the employee's obligations to act in the best interest of OHSU and its missions, and without improper bias. Since the *appearance* of a conflict may be as serious and potentially damaging to the public trust as an actual conflict, potential conflicts must be disclosed, evaluated, and managed with the same thoroughness as actual conflicts.

Who signs CoI disclosures?

- Department chairs (or their designees*) sign the CoI disclosure as the "First Level Signer".

What am I signing? Who determines the management plan?

- Review the entire form for thoroughness and any CoI or CoC concerns.
- Outside activities are approved **by you. You determine** if the activity is approvable and if a management plan is needed (*refer to web guidance for management strategies and acceptability criteria*).
 - Things to consider include: time commitment, appropriate use of OHSU facilities, and potential loss of intellectual property.
- Purchasing conflicts. For any financial interests listed that may be related to an individual's oversight in purchasing decisions, **you determine** the management plan (such as recusal from decision making where appropriate).
- Research disclosures: You may provide input regarding the management plan. Disclosures related to research are reviewed and the final management plan approved by the Conflict of Interest in Research Committee (CoIRC) or the CoIRC Chair. See more information at: <http://www.ohsu.edu/xd/research/about/integrity/coi/management.cfm>

Who else takes part in the review process?

- Deans of each School, the Vice President for Research, or other appropriate second level reviewers (or their designees*) also review forms submitted by researchers that include the report of significant financial interests (no signature required).
- For those who serve on standing purchasing committees such as the Value Analysis Committees and the Pharmacy and Therapeutics Committee, the committee chair or appropriate OHSU Logistics or Pharmacy official will determine appropriate management for any disclosed conflicts, as described in the Conflict of Interest policy
- The Integrity Office also reviews disclosures by OHSU Executives (those who report to a Dean or member of the Executive Leadership Team), as described in the [Institutional Conflict of Interest policy](#)

Signing in eCol

- When signing, there is a check box to indicate that a management plan is needed. It is the responsibility of the chair/supervisor to develop, document and discuss the management plan with the disclosing employee.
 - At this time, there is not a place in the eCol system to upload or document a management plan in full, but there is a comments field to use to make some management plan notes prior to clicking on "sign this form" in eCol.
- If the disclosing employee has not provided enough information in his/her disclosure form, you may also return the form to the employee by using the "return this form" button, after providing your instructions for revisions in the comments box.
- If the proposed Outside Activity is deemed inappropriate, please return the CoI form to the discloser using the "return this form" after making a note in the comments field that the activity is not approved. (The discloser will then need to submit a new form without the prohibited activity).

What guidance is available for me in reviewing?

- Web resources: <http://www.ohsu.edu/xd/about/services/integrity/coi/approvers-guidance/index.cfm>
- Contact the Integrity Office: coir@ohsu.edu or 503-494-8849

**Please inform the Integrity Office when appointing a new CoI approver as your designee.*