

### **CoIR Guidance: Data analysis**

The Conflict of Interest in Research Committee (CoIRC) may require that data analysis involve input or review by a non-conflicted qualified individual.

#### ***Why this requirement?***

- To promote objectivity and transparency in OHSU research by minimizing the chance that bias – actual or perceived – is introduced into the conduct of research when financial interests are involved.

#### ***What is meant by data analysis?***

- Data analysis might include the review, interpretation or summation of data (findings from experiments, test results, etc.) for purposes of guiding future research, and/or for sharing results (e.g., presentations, publications, grant applications) and statistical analysis.

#### ***What constitutes a non-conflicted individual?***

- In general, an individual who qualifies as “non-conflicted” as used in this guidance:
  - Does not have any financial interests in the same entity for which the CoIR management plan has been put in place; AND
  - Does not report, in his/her employment at OHSU, to someone with financial interests in that entity; AND
  - Has appropriate knowledge/expertise to contribute to the data analysis.
- Some examples of individuals that typically serve this role:
  - A colleague at OHSU, whether or not funded by the same monies that support the research being managed by the CoIRC.
  - A colleague outside OHSU, whether or not funded by the same monies that support the research being managed by the CoIRC.
  - A statistician.
  - A colleague who critically reviews the manuscript for a publication or presentation and who has access to the raw data and procedures by which data/samples were collected.
- Other proposals for meeting this requirement shall be discussed with the CoIR Committee prior to implementation and may be considered as acceptable on a case-by-case basis.

#### ***How does the CoIRC establish and monitor compliance with this requirement?***

(Some or all of the following may be utilized in any specific case.)

- Communicates with researchers in the research planning phase to facilitate budget and personnel decisions that are compliant with anticipated restrictions for data analysis (and other aspects of research involving potential conflicts).
- Reviews funding sources and projects (e.g., eIRB or eIACUC projects) for the involvement of non-conflicted investigators.
- Requests researchers to name individuals who will serve this purpose if none is clearly among the co-investigators.
- Conducts periodic review of relevant publications and/or presentations for the inclusion of non-conflicted co-authors and/or acknowledgements to individuals who provided data review.