Determining “Relatedness”
For the purpose of complying with Policy on Conflict of Interest

MSU Conflict of Interest Guidance:

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MSU’s Policy on Conflict of Interest was revised (approved April 13, 2012) to comply with requirements by the Public Health Service (PHS) and National Science Foundation (NSF) relating to conflict of interest. The purpose of these requirements is to ensure that the design, conduct, or reporting the results of research and other sponsored projects funded under grants, cooperative agreements, and contracts will not be biased by conflicts of interest affecting the responsible investigators.

The Policy requires that all individuals who have independent responsibility for proposing, conducting, or reporting the results of University PHS- or NSF-funded research must annually disclose their significant financial interests (SFIs) related to their institutional responsibilities. Additionally, PHS investigators must annually disclose all reimbursed or sponsored travel related to their institutional responsibilities.

In addition, any MSU faculty /academic staff person, whether involved in PHS/NSF or not, is required (as previously) to disclose interests related to any new proposal or project.

MSU is permitted to involve the Investigator in the determination of whether a SFI is related to PHS-funded research. However, the determination of whether a SFI constitutes a financial conflict of interest is the responsibility of MSU’s designated official(s) and is based on whether a SFI could directly and significantly affect the design, conduct, or reporting of the research.

Decisions and determinations about “relatedness” to comply with applicable laws and policies should be guided by the following considerations. These should not be viewed as absolute or comprehensive.

CONSIDERATIONS IN DETERMINING “RELATEDNESS”:

1. Variability of Disciplinary Standards

   - Academic units often have unique disciplinary standards regarding normal scholarly activity, and this must be taken into account when examining income from “outside” activities. For example, physician or nurse academic employees may be expected to provide human healthcare services; creative artists are expected to promote their academic credentials through sharing of their talents, which may generate income. These activities are certainly related to their institutional responsibilities, but they are reasonably not the result of personal initiatives motivated by financial gain or other personal benefit outside of their institutional responsibilities. Still, no outside activity should create a commitment that detracts from the completion of other institutional responsibilities.

2. Disciplinary Focus

   - An individual is expected to disclose personal interests related to their unique interests, activities, and recognized academic expertise. The extent of their “institutional responsibilities” does not necessarily include the entire field of their academic unit. But neither should the distinction between “related” and “unrelated” be evident only to a disciplinary expert knowledgeable at the most detailed level of the specific area of interest. Rather, relatedness should be judged from the perspective of a reasonably informed scholar.

3. External Funding or Sponsorship

   - Does an entity in which an individual has a personal interest directly support his/her research as the prime sponsor?
   - Has an individual developed or implemented a research plan that includes an entity in which he/she has a personal interest?
   - Has an entity in which an individual has a personal interest filed an Investigational New Drug application or hold an Investigational Device Exemption that relates to or may be modified or enhanced by his/her research?
   - Has an individual received a direct or indirect benefit as a result of a gift to MSU from an entity in which he/she has a personal interest?
   - Has MSU provided, or agreed to provide, a direct or indirect benefit to an entity in which an individual has a personal interest as a condition for receipt of an institutional gift?

4. Use of External Resources

   - Will an entity in which an individual has a personal interest provide a drug, device, vaccine, procedure, research facilities, or other proprietary resource to support his/her research?
5. Intellectual Property
   - Has an individual developed intellectual property that is licensed to an entity in which he/she has a personal interest?

6. Product or Service Procurement
   - Does an individual serve as an officer or director of, or hold a personal interest in, a company or other business that the individual knows, or reasonably should know, supplies goods or services to, leases space or property to, or otherwise enters into agreements with, MSU?
   - Does an individual hold supervisory responsibility for, or exercise influence over, procurement of goods, services, space, or property from an entity in which he/she has a personal interest?
   - Will research space be leased to or rented from an entity in which an individual has a personal interest?

7. Impact on Professional Activities
   - Would an individual's personal commitment (e.g., consulting or non-disclosure agreement) to an entity in which he/she has a personal interest constrain, restrict, or conflict with institutional expectations for compliance, public disclosure, or reporting by any individual in any way?
   - Does an individual have supervisory or educational responsibility for a student or postdoctoral trainee:
     - employed by an entity in which he/she has a personal interest?
     - working on a research project that could materially influence the financial value of an entity in which the individual has a personal interest, or that of one of its competitors?
     - being recruited for employment by an entity in which the individual has a personal interest?
   - Does an individual hold a management or board position with, act as consultant to, or benefit from sponsored/reimbursed travel from an entity whose products or services will be used in, are the subject of and/or are closely aligned with the research?

8. Impact of Institutional Activities on External Entities
   - Would an individual's research findings or scholarly communications reasonably appear to influence the financial value of an entity in which he/she has a personal interest, or that of one of its competitors?
   - Does an individual have a personal interest in an entity whose products or services are related to the subject of his/her research?
   - Does an individual have the opportunity to prescribe, recommend, or endorse goods, services, space, or property from an entity in which he/she has a personal interest?

9. Impact of Institutional Activities on Personal Interests
   - Would an individual's research findings or scholarly communications reasonably appear to affect the financial value of an individual's personal interest in an entity, or that of one of its competitors?
   - Is intellectual property (IP) licensed to an entity in which an individual has a personal interest or which generates income of any value from non-MSU IP being used, tested or further developed in his/her research?

Contact:
For further information about MSU's Conflict of Interest policy and process, please see coi.msu.edu. For consultation and assistance contact:

Terry A. May, Faculty Conflict of Interest Officer
408 W. Circle Drive, 105D Olds Hall
fcoiio@msu.edu
517.884.7000 office/voice mail
517.432.9555 fax