

CONFLICTS OF INTERESTS AND GRADUATE STUDENTS PRIMER (2017-2018)

<http://www.colorado.edu/researchinnovation/coi/>

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Outcome Terms Commonly Associated with Conflicts of Interest: *Prejudicial decisions/bias/favoritism; Partisanship; Unfair advantage; Ill-gotten or Undeserved gains (e.g. grades/position/financial); Quid pro quo/Pay to play; Bribery; Diversion of time/resources/monies/intellectual property(IP); Coercion.*

Why are students required to report, annually, via the conflicts of interest disclosure process (aka DEPA)?

University policy, which is rooted in federal regulations, requires any person who is responsible for the design, conduct, or reporting of research or educational activities to report. These groups include:

- All Tenure Track Faculty (all levels); Adjunct, Visiting, and Research faculty (all levels) and select Retired faculty.
- All PRAs, Research Associates and Research Assistants (all levels), Instructors (all levels), Librarians, Museum Associates, and Fellows.
- Non-employee Graduate Students IF they are currently involved in the design, conduct or reporting of any research, or If they are involved in a CU employee-affiliated company/entity.
- Undergraduate students, volunteers and consultants -ONLY IF they are responsible for the design, conduct or reporting of research, OR if they are involved in a CU employee-affiliated company/entity.
- The following groups typically DO NOT need to report: TAs, Lecturers, Professional Exempts and Adjoint faculty. However, university personnel involved in the design, conduct and reporting of research DO need to submit a DEPA, regardless of job type.
- Any KEY PERSONNEL involved in research who is supported in salary, supplies, space or other resources by grant funding. (This includes PIs, co-investigators, and may include coordinators, graduate students/students.)

Emerging Col Issues at CU Boulder:

- 1. Rapid increase of start-up companies & external business affiliations amongst faculty and students.**
 - Student affiliations with faculty-affiliated businesses (e.g. employees of/interns of).
 - Faculty affiliations with student-owned businesses (co-owners/ consultants to).

While entrepreneurship and collaboration are encouraged, they can result in potential, actual, or the appearance of a Conflict of Interest. These situations can put both students and faculty at risk, particularly if a student-faculty collaborative relationship deteriorates.

COI Checklist for graduate students:

1. The majority of graduate students should be submitting a COI disclosure, annually. (Students should be disclosing all affiliations outside of the University where those affiliations are related to their areas of study as described on the COI reporting form.)
3. Students MAY NOT receive a grade or credit from a person with whom there is an external professional relationship/collaboration. (For example, the faculty member is the founder of a company where the student is a part-time employee or intern. The amount of compensation is irrelevant.) An alternative instructor of record (and grader) is required.
4. If a student/faculty external collaboration exists, a management plan is required; if the relationship/collaboration involves the student's academic advisor, a co-advisor must be assigned by the department chair/institute director.
5. Students who have affiliations with an external entity, that does not involve CU faculty, may still need to have management plans put into effect in order to mitigate issues of research bias, IP, etc.