**Rush Conflicts of Interest in Research Policy FAQs**

**Who does the External Relationships and Financial Conflicts of Interest in Research (CC-RC-0008) policy apply to?**

All research personnel engaged in the design, conduct or reporting of research including trainees, medical staff, collaborators, consultants, faculty, students and private practice physicians. All covered officials who are in a position to *influence or commit Rush resources.*

**Research personnel** include the principal investigator, study staff/key personnel listed on the Master Project and any other person who is responsible for the design, conduct or reporting of research.

***Key Personnel*** *are any individual who is listed as a Key Personnel on a NIH funded study; or studies not NIH funded (e.g. FDA regulated research), Key Personnel are those who contribute to the project in a substantive measurable way, involved in the design, conduct or reporting of the research.*

**Who is in a position to influence or commit Rush resources?**

Anyone who can impact decision-making or offer advice on purchasing, hiring, or anything involving Rush funds or facilities.

**What is the difference between actual and potential or perceived conflicts of interest?**

An actual Conflict of Interest arises in a situation where financial or other personal or professional considerations compromise an individual’s objectivity, professional judgment, professional integrity, and/or ability to perform his or her responsibilities to Rush.

Perceived or potential Conflicts of Interest exist in situations where an individual member of the Rush community, a member of the individual’s family, or a close personal relation has financial interests, personal relationships, or professional associations with an outside individual or organization, such that his or her activities within Rush could appear to be biased against Rush by that interest or relationship.

**When should I fill out a conflict of interest disclosure?**

As soon as the situation comes up and before beginning the activity in question, the individual should complete a COI disclosure within the COI Module found on the main page of the Master Project in the Rush Research Portal (RRP).

Also, annually, all members of Rush, whether they are engaged in activities that might create the perception of or potential for a Conflict of Interest or not, are required to fill out an Annual Conflict of Interest Disclosure Survey.  An e-mail notification, distributed in July every year, will provide instructions when it is time to complete the annual disclosure on line.

**To whom should I submit my conflict of interest disclosure?**

The RRP automatically forwards your disclosure to the designated reviewer in the Office of Research Compliance (ORC). If you have difficulty completing your disclosure in the RRP, contact the ORC to assist you.

**If I have a change in one of my outside relationships, is it necessary to disclose the revision?**

Yes it is necessary to notify the Office of Research Compliance when there is a change in one of your outside relationships, within thirty days (30) of that revision, by updating your disclosure (s) in the RRP.

**Can my office or department receive training on the Conflict of Interest Policy?**

Yes. Please contact the Office of Research Compliance Conflict of Interest  to set-up a training session.