Case Study #7

Conflict of Interest

Professor Grain is conducting research on human behavior related to consumption of brand-name health foods in schools. Professor Grain sits on the board for School Vendor Marketing, Inc. and owns $12,000 in stock with them. The company has recently begun investigating new methods for promoting health foods in schools, with the intent of competing with "junk food" brands already in the market. The results of Professor Grain's study, if positive, could have a significant impact on product development within School Vendor Marketing, Inc. Does Professor Grain's situation exceed the University of Kentucky's threshold for declaring financial conflict of interest?

(Hint: See the UK Administrative Regulation for "Conflict of Interest/Financial Disclosure Policy – Research" at: http://www.uky.edu/Regulations/AR/ar070.pdf, or look at the Faculty/Staff Disclosure of Financial Interest Form (Questions #1-4) and/or IRB application "Form Y" [http://www.research.uky.edu/ori/MedicalFullReviewApplication.htm#sponsored].)

ANSWER:

Yes.

The University of Kentucky has established policies, principles, and procedures to ensure that the financial interests of University of Kentucky employees do not compromise the objectivity with which research is designed, conducted, and reported, and to comply with state and federal regulations that are designed to promote objectivity in research activities. To accomplish this, UK's Conflict of Interest Policy requires all UK investigators and key personnel (any faculty, staff, and/or students who may influence the protocol design, conduct, or reporting of activities) to disclose to OSPA when proposing a research project, relevant potential financial conflicts of interest of the investigator and the investigator's family members. The institution needs to be informed if a potential significant financial interests exist, so the conflict can be reviewed and managed or eliminated.

Significant financial interests are anything of monetary value, including, but not limited to, salary or other payments for services (e.g., consulting fees or honoraria), equity interests (e.g., stocks, stock options, or other ownership interests), and intellectual property rights (e.g., patents, copyrights, and royalties from such rights), excluding the following:

1. Salary, royalties, or other remuneration from the University;
2. Income from seminars, lectures, or teaching engagements sponsored by public or nonprofit entities;
3. Income from service on advisory committees or review panels for public or nonprofit entities;
4. Income (e.g., salary, fees, or other continuing payments) in an amount of $10,000 or less per annum from any one business enterprise or entity when aggregated for the investigator and members of the investigator's family; and
5. Financial interests in any one business enterprise or entity if the value of those interests does not exceed $10,000.00 in value as determined through public prices or other reasonable measures of fair market value, and does not represent more than a 5% ownership interest when aggregated for the investigator and members of the investigator's family.