

## **Conflict of Interest**

### ***Introduction***

A-O PTIC and its employees, Corporate Officers, and Board of Directors members, hereafter referred to collectively as Agents, are committed to conducting all A-OPTIC work-related activities in accordance with the highest integrity standards and in full compliance with all ethical and conflict of interest legal requirements applicable to the A-OPTIC. This policy sets forth principles for identifying such potential conflicts and procedures for reviewing and addressing potential conflicts that might occur.

### ***Policy***

The A-OPTIC is committed to fulfilling its mission with integrity and in full compliance with state and federal ethics and conflicts of interest laws and regulations. A conflict of interest exists when an Agent's professional actions or decisions are or have been influenced by considerations of personal or financial gain. Therefore, it is the policy of the A-OPTIC that in all of its activities – the education of trainees; the design, conduct, and reporting of research; the hiring and supervision of staff; the procurement of materials and services; and all other tasks incident to its mission – it shall endeavor to be free of undue influence or bias that may result in conflicts of interest. This Policy is intended to enable Agents to recognize potential conflicting interests and, thus, to protect themselves and the A-OPTIC from such conflicting interests through disclosure, evaluation, and if required, management or elimination of conflicts of interest.

In addition to this Policy, A-OPTIC Agents ethical conduct is governed by:

- Federal regulations governing sponsored research. The National Institutes of Health requires institutions receiving funding to have a conflict of interest policy which complies with its regulations found at [http://grants.nih.gov/grants/compliance/42\\_CFR\\_50\\_Subpart\\_F.htm](http://grants.nih.gov/grants/compliance/42_CFR_50_Subpart_F.htm) . This Policy is intended to comply with those regulations.

### ***Process***

If an Agent thinks that they may have a conflict of interest as defined in this document, he/she should notify the Executive Director or Chair of the Board of Directors. The Executive Committee will review the situation and determine whether or not there is indeed a conflict of interest. If it is determined that a conflict of interest exists, then the Executive Committee on behalf of the BOD shall make organizational adjustments to remove the conflict of interest. Adjustments may include, but are not limited to, changes in employee reporting structure, removal from project.

If an Agent is aware of a conflict of interest and does not disclose to A-OPTIC disciplinary action may be taken up to and including termination of employment.

### ***Applicability***

This policy applies to all A-OPTIC Agents. Agents are expected to review and understand their obligations under this Policy and to be familiar with their obligations under the laws, regulations and policies referenced in Section II of this Policy.

### ***Definitions***

1. **Conflict of Interest.** A Conflict of Interest occurs:

- When an A-OPTIC Agent has a personal interest in a matter that could compromise or impinge on their obligation to the A-OPTIC to exercise their best judgment in pursuit of the interest of the A-OPTIC and its trainees;
  - When a non-A-OPTIC activity unreasonably encroaches on the time an Agent should devote to the affairs of the A-OPTIC; or
  - When an Agent's non-A-OPTIC activities unreasonably impinge on or compromise the loyalty or commitment to their A-OPTIC duties and responsibilities.
  - In sponsored research, when an Investigator's Significant Financial Interest could directly and significantly affect the design, conduct, or reporting of such research.
  - In determining whether a Conflict of Interest exists, an important consideration is whether an independent observer might reasonably question whether the Agent's professional actions or decisions are influenced by considerations of personal gain, financial or otherwise.
- 2. Significant Financial Interest.** A Significant Financial Interest (SFI) consists of one or more of the following interests of the Agent (and those of the Agent's Immediate Family):
- An equity interest (including stock, stock options, or other ownership interest) of \$5,000 or greater in any publicly traded entity as determined through reference to public prices.
  - Any equity interest (including stock, stock options, or other ownership interest) in any non-publicly traded entity.
  - Remuneration for services including annual salary, royalties, consulting fees, honoraria, paid authorship, or anything of monetary value (regardless of whether its value is readily ascertainable) that amount to \$5,000 or more over the 12 months preceding the disclosure.
  - Intellectual property rights and interest (e.g., patents and copyrights), upon receipt of income related to such rights.
  - Investigators also must disclose the occurrence of any reimbursed or sponsored travel (i.e., that which is paid on behalf of the Investigator and not reimbursed to the Investigator so that the exact monetary value may not be readily available), related to their institutional responsibilities; provided, however, that this disclosure requirement does not apply to travel that is reimbursed or sponsored by a Federal, state, or local government agency, or an institution of higher education. The Investigator must disclose, at a minimum, the purpose of the trip, the identity of the sponsor/organizer, the destination, and the duration.

Significant Financial Interests **does not** include:

- Salary, royalties, or other remuneration received from or through the A-OPTIC;
- Intellectual property rights assigned to the A-OPTIC and agreements to share in royalties related to such rights;
- Income from seminars, lectures, or teaching engagements sponsored by public or nonprofit entities;
- Income from service on advisory committees or review panels for public or nonprofit

entities; or

- Investments in and income from investment vehicles, such as mutual funds, pension or other institutional investment fund over which the Agent does not exercise control.
3. **Immediate Family.** The Agent's spouse or domestic partner and dependent children as determined by the definitions of the Internal Revenue Service and State of Kentucky laws.
  4. **Investigator.** Principal Investigators, Project Director **and** all other A-OPTIC Agents who are responsible for the design, conduct, or reporting of sponsored research.
  5. **Sponsored Research.** Research, creative activities, scholarship, training and instructional projects involving funds, materials, or other compensation from outside sources under agreement. Research in this context means a systematic investigation designed to develop or contribute to generalizable knowledge, including behavioral and social-science research.
  6. **Investigator's Institutional Responsibilities.** An Investigator's professional responsibilities on behalf of the A-OPTIC, including, but not limited to: research, teaching, service, professional practice, and institutional review board or other institutional committee membership.

### **Dues**

Dues are determined by the BOD. Since 2007, the dues rate for Members has not increased. Contact the A-OPTIC Executive Director or Associate Director for the actual amount. The Education Coordinator will send invoices to the Members in May of each year, payable by July 1<sup>st</sup>.

### **Staffing Plan**

*Executive Director*

*Education Coordinator*

*Chief Academic Officer*

The Chief Academic Officer, in general, shall serve as the academic consultant to the Executive Director of A- OPTIC and the Membership in all matters related to research, trainees, curriculum, program evaluation, and faculty development. He/she will serve as Chair of the A-OPTIC Osteopathic Graduate Medical Education Committee. The Chief Academic Officer reports to the Board of Directors by way of its Chair, for administrative purposes.

### **Non-Discrimination Policy**

A-OPTIC shall not discriminate on the basis of race, gender, color, religion, national origin, age, veteran status, or sexual orientation in the selection of faculty and administrative personnel. Selection shall also be in accordance with state and federal government guidelines and in compliance with the Americans with Disabilities Act (ADA).