

Conflict of Interest at UIHC

The below principles provide guidance in maintaining compliance with the University of Iowa Health Care (UIHC) Conflict of Interest (COI) Policy.

UIHC COI Policy was developed in 2009 in response to federal regulation and industry ethical standards to help UI faculty and staff engage in professional activities with commercial entities, professional and scientific organizations and journals, other universities, and governmental agencies while avoiding real or perceived conflicts of interest/commitment.

Annual COI Disclosure Period

UIHC requires all faculty, staff, and trainees, except merit staff, working 50-percent time, or more, to complete an annual disclosure and certification of relationships with healthcare industry.

Timeframe	What to Disclose	One Form, Four Offices
Complete initial disclosure within 45 days of hire Occurs each January-April Update, as needed, as new relationships develop, or existing relationships change	Disclose any outside activities with healthcare industry, financial interests or other personal considerations that could create a real or perceived conflict of interest and/or conflict of commitment.	There are four different COI Offices across campus who share one disclosure form. We all review the information provided to assess compliance in our respective areas.

Management Plans

COI Office sends out Management Plans on behalf of the VPMA to those who disclose outside professional financial relationships. These plans contain standard strategies to maintain compliance with policy and still engage in outside activities. Common strategies include, but are not limited to:

- No use of UI resources (staff, equipment, intellectual property) in conjunction with outside resources
- Prior supervisor/DEO approval of outside activity
- No participation on Purchasing or Product Evaluation committees for entities with which there is an outside relationship
- All relevant speeches must include a disclosure of the outside activity

Consulting Activities

Consulting work is allowed under UI policy. Consulting activities include, but are not limited to:

Speaking/
Training

Product
Development

Advisory
Boards

Data Safety
Monitoring
Boards

Please submit a copy of any personal consulting agreements with industry to the COI Office for prior review before signing. The COI Offices must ensure that certain language is included to protect UI intellectual property interest, ensure transparency, and clarify scope of work.

Policy Prohibits

COI policy strictly prohibits certain types of compensation or activities that inherently present a conflict of interest, including:

No Free Gifts

Gift is defined as any item, product, or service, regardless of nature, purpose, or value

Includes small promotional items, cash, samples, food and drink, entertainment, travel expenses

Industry Funded Events

There are exceptions – please check with COI Office

Speaker's Bureau

Presentations or trainings in which the primary purpose is to promote company products is prohibited

Policy Allows

COI Policy does allow the following types of activities:

- Consulting for industry
- Moonlighting (if allowable per employment contract)
- Industry funded unrestricted educational grants
- Industry paid device/equipment training – m if included in education clause in purchase agreement
- Industry donations of devices, equipment, materials – must have Letter of Agreement

Auditing

The COI Office audits compliance with policy by monitoring public disclosure sites, such as the CMS Sunshine Payments, and compare results against our disclosure database.

The COI Office also audits publication disclosure to discern reporting discrepancies and monitors for timely return of management plans and consulting agreements.

Questions

Please contact the Joint Office for Compliance (JOC) if you have any questions or concerns regarding HIPAA.

[COI FAQ's](#)

Phone: 319-384-8282

Email: compliance@healthcare.uiowa.edu

Other Campus COI Offices:

Conflict of Interest in Research /Institutional COI Human Subjects Review Policy
467-1012 or 384-4256 or coi-research@uiowa.edu

Continuing Medical Education, College of Medicine
335-8599 or cme@uiowa.edu

University Conflict of Interest in the Workplace, Office of the Provost
335-5767 or faculty@uiowa.edu

Conflict of Commitment policies, University Human Resources
35-5767 or jan-waterhouse@uiowa.edu