

Conflict of Commitment v. Conflict of Interest

The following table provides an overview of the primary differences between Conflicts of Commitment (COC) and Conflicts of Interest (COI).

For full details, please refer to the links in the table or by visiting the **COI Program website: <https://rgw.arizona.edu/compliance/conflict-interest-program>**

| | Conflict of Commitment Forms | Disclosure of Financial Interests (and certain Personal Interests) |
|-------------------------------|--|--|
| Policy Links | Conflict of Commitment Policy | Individual Conflict of Interest in Research Policy Institutional Conflict of Interest Policy |
| COI Program Webpage | COC Homepage | Investigators Homepage UA Administrators Homepage |
| Purpose (generally) | To ensure that external influences outside the course and scope of one's University employment do not affect the performance of one's primary duties to the University. | To avoid and mitigate bias, or the perception of bias, in research and administrative decisions. |
| Who should disclose | <p>All Full-Time University Employees who engage in an Outside Professional Commitment or in Outside Employment.</p> <p>This applies to Outside Professional Commitments or Outside Employment that occur at any time during the calendar year while the employee's status is that of a full-time University Employee.</p> <p>In other words, if you don't have an activity, you don't need to submit a COC Form.</p> <p>"Full Time" generally refers to 50%+ FTE. <i>Consult your department's business office if you are unsure whether you have Full Time status.</i></p> | <p>All "Investigators," which is defined as any person who is responsible for the design, conduct, or reporting of research, regardless of title or position (can include non-employees).</p> <p>All "Administrators", which is defined as any individual in a position of administrative leadership of a recognized University college, academic department, business, or other administrative unit, where a regular job requirement is to make institutional decisions on behalf of the University of Arizona (regardless of title and whether such positions are staffed on an interim, full-time or part-time basis)</p> <p>All Investigators and Administrators <i>must</i> submit a disclosure, even if they have nothing to disclose.</p> |
| What must be disclosed | <p>All external professional commitments (whether or not compensated) or external employment, <i>except</i> those commitments that are required by UA or encouraged by UA as part of your professional development.</p> <p>Disclosure is limited to individual (no family members).</p> | <p>Any of the following that may be reasonably related to your research or institutional responsibilities at UA:</p> <ul style="list-style-type: none"> • Income, equity interests, or other remuneration • Patents or other Intellectual Property rights • Any managerial, professional, or fiduciary position in an outside entity or organization • For PHS-funded investigators, any sponsored or reimbursed travel <p>Any payment, reimbursement, travel support or other compensation, of any amount that you have personally received, or will personally receive, from a foreign entity must be disclosed.</p> <p>Disclosure extends to spouse, dependent children, and domestic partner.</p> |
| Where to disclose | Electronic COC Form: https://uavpr.arizona.edu/COC | COI Disclosure System: https://uavpr.arizona.edu/COI |
| Review and Approval | COC forms are approved at the Department or Unit level and, in the case of faculty, also at the College level with assistance of the COI Program. | Disclosed interests are reviewed by the Institutional Review Committee and/or Executive Review Committee (both faculty committees), with the assistance of the COI Program, for a determination as to whether a Financial or Institutional Conflict of interest exists |