

Organizational Conflict of Interest Guidance

Organizational Conflict of Interest - any relationship, interest, activity, commitment, or obligation that may adversely affect or be in conflict with the services Woman's performs as a federal awardee.

Organizational conflicts of interest should be addressed for entities that receive federal contracts. A unique type of conflict of interest may arise when members of the institution are awarded federal contracts or assist in the development of federal programs. The purpose of disclosure of these types of conflict of interest is to ensure that research activities serve the national and public interest and are guided solely by objective results. These types of conflicts of interest are described in the Federal Acquisition Regulation (FAR) Subpart 9.5:

<https://www.acquisition.gov/content/subpart-95-organizational-and-consultant-conflicts-interest>

Identification of Potential Organizational Conflicts of Interest

An organizational conflict of interest may exist in three basic categories:

1). Unequal Access to Information

This type of conflict of interest may exist when an institution gains an unfair competitive advantage because of an employee's access to information not generally available to others seeking same federal funding.

2). Impaired Objectivity

This type of COI may exist when an institution's employee works on a government contract that places them in a situation of assessing performance or evaluating products of itself or a direct competitor seeking federal funding. The concern is that the institution is unable to render impartial advice under a federal contract.

3). Biased Ground Rules

This type of COI may exist when an institution's employee provides consultation, advice, or technical assistance related to seeking federal funding and the institution then applies for the same funding opportunity, such as acting as a consultant to develop standards which are used as a basis of Scope of Work that are used to support a federal funding opportunity.

Management of Organizational Conflicts of Interest

Woman's is required to certify to the federal government that any potential organizational conflicts of interest are appropriately managed. Woman's requires all employees to disclose any

relationships, interests, commitments, or obligations related to activities that may give rise to an organizational conflict of interest as defined in FAR Subpart 9.5

Examples of reportable activities with the federal government that should be reported include, but are not limited to:

- Serving as an advisor or consultant to the federal government
- Serving as a member of a federal advisory board
- Working, consulting, or serving on any federal standard setting committee or board
- Working on contracts, providing scientific, engineering, or technical direction to the federal government
- Having access to proprietary, confidential, or sensitive data in the custody and possession of the federal government or other entities working with the government

[Disclosure and Management of Organizational Conflicts of Interest](#)

Investigators should disclose any organizational conflicts of interest to the Research and Development Committee who will work with relevant hospital departments and the government's contracting officer/program manager to develop a mitigation plan to prevent unfair advantage or loss of objectivity regarding federal contract work. Management of the conflict of interest may include recusal from certain activities, maintaining confidentiality of data, review of work by an independent third party, or other stipulations.