

Johns Hopkins University

Guide to Financial Conflict of Interest Review

Working with industry and creating start-up companies can generate opportunities to share knowledge and advance technology for the benefit of society. Johns Hopkins University encourages commercialization activity that promises to move innovations from our faculty members' laboratories to the market and other settings for the advancement of human health and welfare.

The financial interests that come with commercial ventures can lead to conflicts of interest and questions about the appropriate commitment of time and resources. Most of these issues can be successfully managed with full and timely disclosure and review. Concerns related to professional commitment are usually reviewed and managed by the appropriate department and/or division director. Issues of financial conflict of interest (FCOIs) with research are reviewed and managed by the committee affiliated with the school where the individual has a primary faculty appointment.

Are FCOIs allowed?

Yes! A FCOI exists when you have a personal financial interest that is related to your research. When this occurs, your financial interest may affect or be perceived to affect the integrity and objectivity of your research, the safety of human subjects, and/or the rights and interests of students and/or trainees. Most FCOIs can be successfully managed with measures designed to protect you and the University against these actual and/or potential risks.

How are FCOIs reviewed?

Most FCOIs are reviewed on a case-by-case basis by the Committee. These reviews take into consideration the nature and magnitude of the financial interest(s) as well as the nature of the related research.

Most FCOIs that involve non-human subjects research can be successfully managed. Likewise, most FCOIs that involve human subjects research that entails no more than minimal risk to subjects can be successfully managed.

When a FCOI involves a significant financial interest and related human subjects research that entails more than minimal risk to subjects, a compelling justification is required in order for the arrangement to be successfully managed.

When should FCOI review occur? And how do I initiate FCOI review?

The earlier the better! In particular, if you are thinking about forming a start-up company, disclose as early as possible, ideally before forming the start-up. To initiate a review, submit the information in eDisclose: <http://edisclose.jhu.edu>.

What if I want to have a role in a start-up?

The professional commitment and FCOI reviews will take into consideration these concerns, among others, when you propose to have a role in a start-up:

- Your time commitment to the start-up should be discussed with your department and/or division director to ensure expectations regarding your research, clinical, and education responsibilities continue to be met.
- While advisory roles such as consultant, scientific advisor, or medical advisor are preferable, it may be possible to hold a fiduciary role, such as a member of the Board of Directors or officer position, depending on factors such as the stage of the company and the nature of your research.
- Any use of Johns Hopkins space, equipment, and/or other resources for your start-up related activity must be negotiated with your department and/or division director and the appropriate institutional official(s).

Who do I contact if I have questions?

Contact the office or staff member affiliated with the school where you have a primary faculty appointment.