Responsible Conduct of Research Workshop Series, 2017-2018

Peer Review/Conflict of Interest

November 16, 2017
Obligations of Researchers / Scholars

- “... researchers have an obligation to honor the trust that their colleagues place in them.”
- “... researchers have an obligation to themselves.”
- “... researchers have an obligation to act in ways that serve the public.”

Two Areas of Emphasis

- Conflicts of Interest
- Peer Review/minimizing Bias
Objectives

- Define “financial conflict of interest” and give actual or hypothetical examples from your discipline
- Define “conflict of commitment” and give actual or hypothetical examples from your discipline
- Indicate why financial conflicts of interest are not inherently bad
- Describe ways in which conflicts of interest may affect trust in research results, the researcher's reputation, and the university reputation
- Understand ways of disclosing, managing, reducing, or eliminating financial conflicts of interest
Objectives, continued

- Understand the major provisions of MSU's Conflict of Interest Policy
- Identify the office or offices at MSU that handle concerns about conflict of interest
What is Conflict of Interest?

- **Conflict of Interest (COI):** Situation where a person is trusted to act impartially (to make unbiased professional decisions), yet the person has personal interests that could influence or "bias" professional judgments and actions;
- Situation where one’s actions and motives may be questioned because of competing interests.

Source: Conflict of Interest – Michigan State University, http://coi.msu.edu/definitions

“... conflicts of interest can create an impression of impropriety that, in the long run, might undermine the credibility of an individual or even an entire profession. At a time when policymakers, politicians and the public increasingly rely on scientific advice about controversial issues—for example, human embryonic stem cells, genetically modified crops or global climate change—conflicts of interest diminish the public's trust in the independence and unbiased judgement [sic] of academic scientists. To maintain trust, researchers must remain visibly trustworthy, which requires a careful and explicit management of conflicts of interest.”
“Universities involved in federally sponsored medical research rarely take steps to investigate, reduce, or eliminate financial conflicts of interest among their scientists, a government audit report said Thursday.

“The report, by the inspector general of the Department of Health and Human Services, is the latest in a series of audits over the years that have criticized both universities and the National Institutes of Health, which distributes $24-billion a year in research money, as insufficiently attentive to biases affecting the reliability of American medical research.”

URL:
Why Do Conflicts of Interest Matter?

- In medical research, education, and practice
  - “... conflicts of interest threaten the integrity of scientific investigations, the objectivity of professional education, the quality of patient care, and the public’s trust in medicine.” Conflict of Interest in Medical Research, Education, and Practice, http://www.iom.edu/Reports/2009/Conflict-of-Interest-in-Medical-Research-Education-and-Practice.aspx

- Similar concerns exist in other scientific disciplines
Why Do Conflicts of Interest Matter, continued

- **Scientific integrity**
  - Conflicts of interest may (but not always) lead to bias that can affect the outcomes of research
  - The scientific record may be distorted
  - People who base decisions on research results may make unwise decisions if those results are inaccurate

- **Objectivity in education**
  - Faculty/mentor conflicts of interest may lead to presentation of biased information or research approaches to students/trainees
Why Do Conflicts of Interest Matter, continued

- **Preserve public trust**
  - Faculty members hold positions of trust within the university, scholarly community, and public
  - Unmanaged conflicts of interest erode trust and may contribute to:
    - A lower likelihood that research results will be believed and used
    - Damaged relationships with colleagues
    - Damaged reputations for the investigator and possibly the institution and other researchers
    - Less probability of receiving financial support for research in the future
Financial Conflicts of Interest

Financial conflicts of interest “are situations that create perceived or actual tensions between personal financial gain and adherence to the fundamental values of honesty, accuracy, efficiency, and objectivity.”

ORI Introduction to the Responsible Conduct of Research, http://ori.dhhs.gov/education/products/RCRintro/
Financial Conflicts, continued

According to federal regulations, financial conflicts of interest may include:

- Salary or other payments for services, such as consulting fees or honoraria
- Equity interests, such as stocks, stock options, or other ownership interests
- Intellectual property rights, such as patents, copyrights, and royalties from such rights

National Institutes of Health
MSU start ups...some examples

Biophotonic Solutions Inc.

LifeBlood

NamesforLife

Phenometrics

Michigan State University

Research & Scholarly Integrity
A conflict of interest exists “when a faculty member’s financial interests or other opportunities for tangible personal benefit may compromise or reasonably appear to compromise, the independence of judgment with which the faculty member performs his/her responsibilities at the University.”
Financial Conflicts:

MSU Financial Conflict of Interest Policy

http://coi.msu.edu/

- **Disclosure** — a faculty or staff member must disclose a conflict of interest to her/his unit administrator as soon as she/he is aware of the conflict

- **Significant financial interest** A financial interest consisting of one or more of various types of financial interests that, when aggregated over the previous calendar year, exceeds $5,000.

- **Review, management, and resolution of reported conflicts of interest** — the unit administrator must take a leadership role

- **Michigan Contracts of Public Servants with Public Entities Law** — Board of Trustees approval is required when the financial interest involves an entity owned partly or managed by an MSU employee
Example: Conflict-of-Interest Concerns Halt NIH Project at Emory U. (10/15/08)

“The National Institutes of Health has stopped a major $9.3-million, five-year study at Emory University because of concerns over payments made by drug companies to the former chief researcher on the project. The university received funds for the first two years of the project, a study on depression, but the NIH froze the rest of the money for the study …” The article further explains that the PI for the project failed to disclose nearly $2M received from pharmaceutical companies between 2000 and 2007.

Example: Nature Publishing Group’s Policy for Authors on Competing Financial Interests

“In the interests of transparency and to help readers to form their own judgements of potential bias, Nature journals require the authors of most articles to declare at the end of the manuscript any competing financial interests in relation to the work described.” … (policy continues)

Nature Publishing Group, For Authors and Referees
http://www.nature.com/authors/editorial_policies/competing.html
Key Student / Postdoctoral Trainee Interests

- Will a student’s or post-doctoral trainee’s efforts contribute to the completion of work related to the conflict of interest situation?
  - Will the student’s work contribute to their thesis / dissertation or other project for academic credit?
  - Are there any constraints or restrictions imposed on reporting or publication by graduate students or postdoctoral trainees as a result of their efforts related to the conflict of interest situation?

- Does the faculty member plan to serve as graduate committee chair or member of the graduate committee for these graduate students or supervise a post-doctoral trainee?
RCR Topic: Conflict of Interest

Title: Show Me The Money!

Case: Dr. Galloway's lab has been studying the effect of certain compounds on high blood pressure. Mr. Conte, a representative from Drug Inc., has approached him about doing a study on Compound Q, a natural compound found in some plants that may lower the blood pressure of patients with chronic high blood pressure.

- Dr. Galloway is a world-renowned pharmacologist, and is well respected within his field. When he publishes a study, people tend to take notice. However, as with everybody during these tough economic times, he is having trouble bringing in the money to fund his research.
- Drug Inc. is willing to fund this 100% of the costs associated with this study. Although nothing is put into writing, Mr. Conte hints that if the outcome appears beneficial, the company would be willing to fund future studies in Dr. Galloway's lab.
- Dr. Galloway has actually been following Drug Inc. and several of their products for several years, and believes that many of their products show promise. Because of this, and unbeknownst to Mr. Conte and Drug Inc., Dr. Galloway carries a small amount of stock in the company.

Dr. Galloway decides to go ahead and pursue the study. Since he wants to avoid issues associated with a conflict of interest, he assigns a valued postdoctoral fellow to serve as PI for the project, although Dr. Galloway is still involved with some of the data analyses. The study shows that the product being tested likely has positive benefits, and Galloway's lab publishes these results. In the following years, Dr. Galloway's lab conducts several other studies that are funded by Drug Inc.

Discussion Questions

1. According to MSU policies, does Dr. Galloway have a conflict of interest that should have been disclosed to the university and to everyone else involved with this study?
2. Is Dr. Galloway avoiding this conflict of interest by assigning someone from his lab to do the actually study and not doing it himself?
3. Was it wrong for Mr. Conte to suggest to the Galloway lab that positive results would likely lead to future funding?
4. Where could Dr. Galloway and others learn more about conflicts of interest in research?
Dr. Galloway has a conflict of interest.

1. Yes.
2. No.
3. Maybe
The postdoc has a conflict of interest.

1. Yes.
2. No.
3. Maybe
Managing Financial Conflicts

- **Focus on maintaining the trust by others that academic and scientific decisions are made responsibly**
  - “You do not have to do anything improper to have a conflict of interest; it is strictly situational.” Friedman, Paul J. (1992). The Troublesome Semantics of Conflict of Interest. *Ethics & Behavior, 2*(4), 245-251.

- Presence of conflict of interest does not mean that there has been or will be a misdeed

- **Failure to disclose a conflict of interest is a misdeed**
Managing Financial Conflicts:

Disclosures

- Multiple disclosures to the institution
  - To Faculty Conflict of Interest Committee
  - To Grants and Contracts
  - To IRB and Data Safety Monitoring Committees
  - To Participants
- Disclosures in publications
- Disclosures in presentations
- Disclosures on web sites
- Disclosures to advisory groups/study sections
- Disclosures to companies, foundations, and associations
- Disclosures to regulatory agencies (e.g., FDA)
Managing Financial Conflicts:
Management and Resolution

- **Disclose** – tell someone who can provide advice and supervision, or who has a need to know

- **Manage** – ask objective reviewers to monitor activities, separate responsibilities for financial and research decisions, modify the research plan, appoint another faculty member to supervise trainees

- **Reduce** – make conflicts less severe or troublesome using any of the methods on this slide

- **Eliminate** – decide not to do the research or disqualify a researcher who has a serious conflict of interest
All faculty must Annually Disclose
Questions about Conflict of Interest

- MSU Faculty Conflict of Interest Policy
  http://www.hr.msu.edu/documents/facacadhandbooks/facultyhandbook/facultyCOI.htm

- MSU Faculty Conflict of Interest Handbook
  https://www.msu.edu/~biomed/COI/COIHandbook.html

- MSU Conflict of Interest Information Officer
  Brian Mattes
  105D Olds Hall
  Phone 517-884-7000
  Email fcoiio@msu.edu
Sources

- MSU Faculty Conflict of Interest Policy
  http://www.hr.msu.edu/documents/facacadhandbooks/facultyhandbook/facultyCOI.htm

- MSU Faculty Conflict of Interest Website
  http://coi.msu.edu/
I have a conflict of interest.

1. Yes.
2. No.
3. Maybe
JUDGING QUALITY RESEARCH / SCHOLARSHIP

Insuring Fairness & Objectivity in PEER REVIEW!
Peer Review

- “Peer review (also known as refereeing) is the process of subjecting an author's scholarly work, research, or ideas to the scrutiny of others who are experts in the same field.”

- Helps to establish the quality of the research and manuscript – it is judged by experts

- Contributes to fair editorial decisions about what does and does not get published
  - [http://grad.msu.edu/researchintegrity/resources/peerreview.aspx](http://grad.msu.edu/researchintegrity/resources/peerreview.aspx)
Always review others' work as fairly and carefully as you would want them to review your own.
Ethical Principles for Reviewing

- **Fairness** — The reviewer must make every effort to provide an objective and impartial review.

- **Confidentiality** — The reviewer may not use ideas from the manuscript until it is published, and then only with an appropriate reference citation.

- **Speed** — Out of courtesy to the authors and respect for the scientific community, the reviewer should complete the review within a reasonable amount of time.
Being an Editor....
Confidentiality...

the state of being secret
How Confidentiality is used in Peer Review

- Reviewers must agree – this is not for sharing
- Editors must agree
- Study Sections must agree
- Scientific Review Officers must agree

Get the picture?
Publishers have to promise, too!

http://www.mscediting.com/service/confidentiality.html
CONFIDENTIALITY OF THE REVIEW PROCESS:

It is inappropriate for you, or anyone on your behalf, to contact a study section member (or potential member) regarding the review of your grant application either before or after the meeting of the study section. For a variety of reasons, reviewers are instructed not to discuss anything about the review with anyone.
Research/Scholarly Integrity Resources

- The Graduate School
  - [http://grad.msu.edu/researchintegrity/resources/](http://grad.msu.edu/researchintegrity/resources/)

  - *Guidelines for Graduate Student Advising and Mentoring Relationships*
  - *Guidelines for Integrity in Research and Creative Activities*
FUTURE RCR WORKSHOPS

- Spring Semester – Jan 11 2018 Use of Human subjects

- Research & Scholarly Integrity
  - [http://grad.msu.edu/researchintegrity/](http://grad.msu.edu/researchintegrity/)