



**NIGERIAN INSTITUTE
OF MEDICAL RESEARCH**

FINANCIAL CONFLICT OF INTEREST POLICY

RESPONSIBLE OFFICE:

GRANTS UNIT
NIGERIAN INSTITUTE OF MEDICAL RESEARCH

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Responsible Office: Grants Unit, Nigerian Institute of Medical Research

Purpose/Rationale

Nigerian Institute of Medical Research (hereafter referred to as the “NIMR”) strives to conduct research into diseases of public health importance and develop structures for the dissemination of research findings without bias resulting from financial conflict of interest (FCOI), while providing the enabling environment and facilities for health research and training in cooperation with the federal and state ministries of health and in collaboration with universities, allied institutions and organized private sector nationally and internationally. NIMR’s goal is to promote research transparency and objectivity and establish standards that protect the rights and safety of research participants; preserve the integrity of research design, conduct and reporting of all studies without bias, including research funded by the Public Health Service (PHS) of the US Department of Health and Human Services (e.g., National Institutes of Health (NIH), Centers for Disease Control and Prevention (CDC) etc.). The purpose of this document therefore is to (1) define Conflict of Interest and Conflict of Commitment (2) describe NIMR’s policy on the review, management and oversight of Conflicts of Interest and Conflicts of Commitment, (3) provide standards and procedures for disclosing and/or reporting potential Conflicts and Outside Professional Activities.

Scope

Covered Individuals include all (i) NIMR employees such as Principal Investigators (PI), Research Fellows, Associated Personnel, Adjunct Researchers and other scientists/administrators who have leadership roles at NIMR or receive any internal or external funding at NIMR and (ii) persons responsible for the design, conduct or reporting of research at NIMR funded by the Public Health Service, or proposed for such funding. In connection with a Conflict of Interest, including a Significant Financial Interest, the term Covered Individual is deemed to include the Covered Individual and his or her Family Members. Research Fellows, PIs, Co-PIs, Investigators, Scientists, Adjunct Researchers and Associated Personnel who are affiliated with any of NIMR’s partner Institutions (or other institutions) must also adhere to the conflict of interest and other applicable policies of NIMR.

Principles

There are many societal, institutional and individual benefits that derive from collaborations and other relationships with industry and other organizations. At the same time, such relationships have the potential to give rise to Conflicts that compromise, or appear to compromise, the integrity and objectivity of research and business decision-making. The appearance of a Conflict may undermine public trust and NIMR's mission.

Policy

NIMR encourages its scientific and administrative staff to participate in outside professional activities that further its mission, provide productive collaborations and promote the practical application of scientific discoveries. It is the policy of NIMR that all Conflicts of Interest and Conflicts of Commitment be identified, disclosed and appropriately managed. In addition, NIMR recognizes the central role of training in all aspects of this policy for all research investigators in maintaining compliance to the policy.

Core requirements

- Covered Individuals must never let personal, financial, business or other interests influence or appear to influence their business dealings or decisions they make on behalf of NIMR.
- Transparency and disclosure are fundamental to managing actual or potential Conflicts of Interest.
- Covered Individuals must comply with the approval and disclosure requirements detailed in this policy.
- Covered Individuals must disclose actual or potential Conflicts of Interest, including Outside Activities such as Consulting, by reporting using standard NIMR FCOI disclosure forms annually or at the time of any change, which is reviewed by the Head of Monitoring and Evaluation Unit as described below in this policy. Covered Individuals are required to participate in any required training programs related to compliance with this policy.
- Covered Individuals responsible for the design, conduct or reporting of research at NIMR funded by the Public Health Service (PHS) are required to complete Conflict of Interest training prior to engaging in PHS-funded research and at least every four years, and immediately under the designated circumstances including when the policy changes in a manner that affects such a Covered Individual's requirements; when such a Covered Individual is new to NIMR; when the Institution finds that such a Covered Individual is not in compliance with this policy or a conflict of interest management plan.

Definitions and Acronyms

Core Definitions

Conflict of Interest means situation in which a Covered Individual, or a member of the Covered Individual's Family, has a Significant Financial Interest or non-financial interest that may compromise, or provide the incentive to compromise, the Covered Individual's behavior in the conduct of his or her activities at NIMR, the Covered Individual's decisions on behalf of NIMR, or the Covered Individual's influence over his or her associates at NIMR.

A financial interest related to research means a financial interest in the sponsor, the product or service being tested, or any other financial interest that reasonably appears to be related to the Investigator's institutional responsibilities

An Institutional Conflict of Interest involving human subjects research means a situation in which the financial investments or holdings of NIMR, gifts/charitable donations in support of research made to NIMR or the personal financial interests or holdings of Covered Individuals with a Leadership Role may affect or reasonably appear to affect NIMR's processes for the design, conduct, reporting, review or oversight of human subjects research.

A Conflict of Interest may be real, potential or apparent.

Conflict of Commitment means a situation where a Covered Individual's commitment to Outside Professional Activities adversely affects his or her capacity to meet his or her responsibilities at NIMR. A Conflict of Commitment is perceptible because of a reduction of the Covered Individual's time and intellectual energies devoted to NIMR activities. Whenever a Covered Individual's Outside Professional Activities exceed the permitted limits of his or her Outside Professional Activity Time Allowance (as defined herein), or whenever an employee's primary professional loyalty is not to NIMR, a Conflict of Commitment exists. Certain Institute Members and Associated Personnel are required to meet the teaching and other obligations of their Home Institutions and such obligations are not considered Conflicts of Commitment.

Conflicts means, collectively, Conflicts of Interest and Conflicts of Commitment.

Other Definitions

Adjunct Researchers means scientists at NIMR who are employees of NIMR's Partner Institution and are formally appointed every two years as Adjunct Researchers of NIMR. Adjunct Researchers are active participants at NIMR, who may attend regular scientific meetings and collaborate on projects, and are eligible for NIMR funding.

Associated Personnel means those Adjunct Researchers, Visiting Faculty, Associated Staff and NIMR Scientific Trainees who are members of NIMR community, but are not NIMR employees (i.e., are not paid through NIMR payroll system or eligible for NIMR employee benefits).

Associated Staff means scientific or administrative personnel who are from the labs of the PI or any of the PI's satellite facilities that have formal appointments bearing NIMR name but may not necessarily be under NIMR's payroll.

NIMR Scientific Trainee means (i) any graduate student or postdoctoral scholar from a NIMR Partner Institution who spends more than 20 hours per week at NIMR, (ii) any postdoctoral associate or fellow who is not a NIMR employee (i.e., is on NIMR payroll and eligible for NIMR benefits) or (iii) any graduate student or postdoctoral scholar who is mentored by a Core NIMR Member.

Business means any commercial enterprise operated for the purpose of earning a profit by providing a product or service, including a corporation, partnership, sole proprietorship, trust or other legal entity.

Compliance Officer means an officer from the Grants, Monitoring and Evaluation Unit, who serves as a subject matter expert in connection with this policy.

Conflicts Advisory Committee (CAC) means the committee that provides scientific and technical advice to the CRO, reviews decisions of the CRO as requested and assists the CRO in making decisions regarding the management of Conflicts. The CAC may seek internal and external counsel on relatedness and Conflicts issues, as needed. The CAC shall be appointed by the CRO and will meet as needed.

Covered Individuals, for the purposes of this policy, has the meaning set forth above under "Scope."

CRO means NIMR's Conflict Review Officer, who has primary responsibility for the implementation and enforcement of this policy and appoints and chairs the CAC. The CRO will have access to internal and external legal counsel and scientific advisors in the event that issues arise that require such expertise. The CRO shall be appointed by the Director-General of NIMR and is currently the Head of Grants, Monitoring and Evaluation Unit.

ELT means the Executive Leadership Team of NIMR.

Family Member means the spouse or significant other living in the same household and any minor or dependent children of a Covered Individual.

Interested Organization means any outside organization (i) in which a Covered Individual has a financial or fiduciary interest or an Official Position, and the Covered Individual's job duties involve or could involve the organization; (ii) which uses, or might potentially use, technology used, owned or developed at NIMR; (iii) with which NIMR has direct business dealings or (iv) which has among its founders any Institute Member or Adjunct Researcher.

Leadership Role means a role at NIMR that includes the authority to direct the work of any other individual or team, make decisions on behalf of NIMR, including but not limited to authorize a business engagement and initiate a contract with a third party, or serve on any institutional level committee.

Official Position means any position having authority to direct or control a material segment of the operation or management of a Business, including executive positions or serving on the Board of Directors.

Outside Interest means any right to compensation, financial interest or equity position in any Business. Examples of financial interests include, but are not limited to, stock, stock options and the right to receive remuneration, such as salary, consulting fees, allowances, discounts and the like. Excluded from this definition is an interest arising solely by reason of investment by a mutual fund, pension fund or other institutional investment fund or a blind trust over which the Covered Individual does not exercise control.

Outside Professional Activities means activities engaged in by a Covered Individual outside of NIMR in a formal capacity. Outside Professional Activities may be compensated or uncompensated and must be disclosed in accordance with the terms and processes of this policy.

Outside Professional Activity Time Allowance means the amount of time a Covered Individual is permitted to spend engaged in Outside Professional Activities.

Institute Members, Adjunct Researchers and Visiting Faculty are permitted to devote time to Outside Professional Activities as permitted by their home institutions. Prior to engaging in consulting, Institute Members, Adjunct Researchers and Visiting Faculty must follow the institutional review process detailed in NIMR Consulting Policy.

NIMR scientific and administrative employees at the level of senior director or higher are permitted to devote up to four hours per week during NIMR working hours and additional time outside of their normal working hours to Outside Professional Activities. Prior to engaging in consulting, such NIMR employees must follow the institutional review process detailed in NIMR Consulting Policy.

All NIMR scientific and administrative employees are permitted to engage in Outside Professional Activities outside of their normal working hours. NIMR Scientific Trainees must obtain the written approval of their supervisors prior to engaging in such activities. Prior to engaging in consulting, all NIMR employees and NIMR Scientific Trainees must follow the institutional review process detailed in NIMR Consulting Policy.

Significant Financial Interest means (i) for a publicly traded entity, anything of monetary value, including salary, royalties or other payments in the preceding 12 months and the value of any equity interest as of the date of the disclosure, that when aggregated for the Covered Individual and his/her Family Members exceeds \$5,000; (ii) for a non-publicly traded entity, anything of monetary value, that when aggregated for the Covered Individual and his/her Family Members

exceeds \$5,000 or when the Covered individual or Family Member holds any equity interest. Excluded from this definition is an equity interest arising solely by reason of investment by a mutual fund, pension fund or other institutional investment fund or a blind trust over which the Covered Individual does not exercise control.

Sponsored Research means research, training or instructional projects involving funds, materials, services or other compensation from a source outside of NIMR.

Technology means a diagnostic, therapeutic, medical or surgical procedure and any process, method, compound, drug, device, invention or other intellectual property.

Third Party Travel means travel that is reimbursed or sponsored by a third party, excluding travel reimbursed or sponsored by a Federal, state or local government agency, an institution of higher education, an academic teaching hospital, a medical center or a research institute that is affiliated with an institution of higher education.

Visiting Faculty means a faculty member of NIMR community who has gained access to NIMR after signing a visiting scientist agreement. Visiting Faculty contribute to the intellectual life and research of NIMR, but are not Institute Members or Adjunct Researchers.

GUIDANCE FOR COVERED INDIVIDUALS: DISCLOSURE TO AND PRIOR APPROVAL BY THE CRO

The following table details the Outside Professional Activities and other interests that must be disclosed to and/or approved in advance by the CRO (or other approval body noted).

A. Outside Professional Activities and Interests

Interest or Activity	Disclosure to CRO Required	Prior Approval by CRO Required	Notes
Ownership Interests in Interested Organizations (includes: stocks, equity, options) ¹	Yes	Yes	*For Significant Financial Interests ¹
Ownership Interests in Non-Interested Organization	Yes	No	*For Significant Financial Interests ¹
Official Positions in Interested Organizations (e.g., an executive position or board membership)	Yes	Yes	
Official Positions in Non-Interested Organizations (e.g., an executive position or board membership for a Business or not-for-profit organization)	Yes	Yes	
Consulting with an Interested Organization or other Business (including: advisory consulting, speaking in a closed meeting or forum organized by a company, serving on a scientific	Yes	Yes	Refer to procedures under NIMR Consulting Policy. Approval by ELT required.

Remuneration Paid by an Interested Organization to a Covered Individual	Yes	Yes	Includes remuneration of any amount and any type
¹ Excluded are interests arising solely by reason of investment by a mutual fund, pension fund or other institutional investment fund or a blind trust over which the Covered Individual does not exercise control.			
Remuneration Paid by an Interested Organization to a Covered Individual's Family Member	Yes	Yes	Includes remuneration of any amount and any type
Activities for Government or Not-for-Profit Agencies (e.g., NIH study section, committee partner institution)	Yes	No	
Participating in research involving an invention licensed by NIMR in which you are a named inventor, or having influence on business decisions about your licensed invention (regardless of whether it is owned by NIMR, home institution or other entity)	Yes	Yes	

Disclosure and/or of Unpublished Information in an Outside Professional Activity (e.g., arising from NIMR confidential unpublished or proprietary information or results of research a Business for whom the covered Individual is providing consulting or other services)	Yes	Yes	<p>Requirements do not apply to scientific presentations, unless the content is the result of an industry or other collaboration that has its own contract requirements.</p> <p>NIMR unpublished/confidential information must not be shared with a Business without the protection of a non-disclosure or confidential disclosure agreement (NDA/CDA).</p>
Legal Actions (e.g., service as expert or fact witness)	Yes	No*	<p>*Unless one of the parties to the lawsuit is an Interested Organization.</p>

Prolonged Absence (i.e., a commitment outside of NIMR that involves frequent or prolonged absence on non-NIMR business)	Yes	Yes	*Allowable exceptions include: instructional or research activities performed in the course of normal faculty leave; and any prolonged absences that are allowable under general employment law and NIMR policy.
Engagements Limiting Scope of Activity at NIMR (e.g., an arrangement with a non-NIMR affiliated entity that limits the Covered Individual's performance of research or other duties)	Yes	Yes	

B. Research Conflicts of Interest

Research Conflicts of Interest must be disclosed and prior approval by the CRO is required. A Research Conflict of Interest exists when both of the following conditions are true:

1. The Covered Individual is named on a protocol or research plan as an investigator, or is involved in the interpretation of outcomes tests or data analysis, or will be named as an author on publications of the study results; and
2. The organization with which the Covered Individual has a relationship can be reasonably seen as having an interest in the conduct or outcome of the research.

The following situation(s) are NOT permitted:

1. A Covered Individual entering into an agreement with a Business that prohibits or unduly limits publication or evaluation of research by reviewing entities, or that links payment to favorable research results or that would require disclosure of confidential or unpublished information to the Business.
2. Any Outside Professional Activity by a Covered Individual that would limit NIMR's research rights.

3. Any use of NIMR resources for an Outside Professional Activity of a Covered Individual.

C. Business Conflicts of Interest

When both of the following conditions are true, a Covered Individual is deemed to have a Business Conflict of Interest and must recuse himself or herself from the decision-making process and the recusal must be documented in writing:

1. The Covered Individual or his or her Family Member has a Significant Financial Interest or Outside Interest in, or an Official Position at, an Interested Organization with which NIMR is engaged in business discussions; and
2. The Covered Individual has the authority to influence NIMR's business decisions involving the Interested Organization.

D. Conflict of Interest in Supervision and Outside Professional Activities of Trainees

The impact of a mentor's or supervisor's Conflict of Interest on trainees (including, but not limited to, NIMR Scientific Trainees) and other NIMR employees is of special concern to NIMR. The extent and quality of the training experience provided to a trainee or other employee should not be diminished because of his/her mentor's or supervisor's Outside Interests or Significant Financial Interests. The training experiences of trainees and other employees are expected to incorporate the values of objectivity in research and reflect the importance of public trust.

A Conflict of Interest exists when:

1. A Covered Individual or his or her Family Member has an Outside Interest in an organization that can reasonably be seen as having an interest in the work performed by a trainee or other employee; and
2. The Covered Individual is a mentor or supervisor to the trainee or employee.

Before beginning a research project, the mentor or supervisor must provide his or her trainee or other employee with a clear description of any Outside Interest or Significant Financial Interest the mentor or supervisor has in a Business that may be affected by the outcome of research performed by the trainee or other employee.

Part-time involvement of trainees (including, but not limited to, NIMR Scientific Trainees) and other NIMR employees in the Outside Professional Activities of Institute Members and Adjunct Researchers may, under certain conditions, offer the potential for substantial benefits to the education and professional development of the trainee or employee. In each case of such involvement, the arrangement must be disclosed in advance to the CRO and reviewed and approved by the ELT. In considering such arrangements, Institute Members and Adjunct Researchers should be guided by the need to avoid Conflicts of Interest and to avoid infringement upon the trainee's or employee's academic duties and rights. Generally, if the Institute Member

or Adjunct Researcher has a role in supervising the trainee's thesis or in supervising the work of the trainee or employee as an instructor or postdoctoral scholar, such outside involvement should not be undertaken to avoid potential Conflicts of Interest in the evaluation of the trainee's or employee's performance. In addition, within a NIMR laboratory or NIMR Partner Institution laboratory, and Adjunct Researchers should take care not to give the impression of favoritism to trainees/employees, including through involving them in Outside Professional Activities.

E. Third Party Travel

Covered Individuals must disclose all Third Party Travel. Disclosure includes purpose of trip, sponsor/organizer, destination and duration.

F. Conflict of Commitment

Each supervisor has primary responsibility to oversee Conflicts of Commitment. Covered Individuals have an obligation to disclose Outside Professional Activities and to comply with the Outside Professional Activity Time Allowance applicable to his or her position, in accordance with this policy and the Consulting Policy. As detailed in this policy and the Consulting Policy, approval is not required for general professional seminars, lectures or service on advisory committees or review panels for government or nonprofit organizations. Reimbursement of routine costs (accommodations, meals, travel and transportation) afforded regular participants are acceptable, as are honoraria at the level generally established for all speakers or presenters.

PROCEDURES

How and When to Make Disclosures

All Covered Individuals who have any Outside Interests or engage in any Outside Professional Activities have a responsibility to disclose those interests or activities as follows:

1. **At Time of Hire.** A Covered Individual must complete the Outside Activities Disclosure Form when he or she is hired or begins to use NIMR facilities.
2. **Through the Annual Disclosure Process.** Covered Individuals are required to complete the Outside Activities Disclosure Form on an annual basis. Covered Individuals are notified annually by NIMR via email and internal memo of this requirement.
3. **At Time of Acquisition of an Outside Interest or Upon Commencement of an Outside Activity.** Covered Individuals are required to update their Outside Activities Disclosure Form if they acquire a new Outside Interest or participate in a new Outside Professional Activity.
4. **As Part of Public Health Service and National Science Foundation Grants.** In compliance with federal regulations, Conflicts must be disclosed prior to submission of an application or proposal and addressed prior to receipt of federal grant funding. This policy also applies to subrecipients where NIMR is the prime institution granted an award. Principal Investigators (PIs)

must submit a Principal Investigator Certification on Investigator Conflict of Interest for PHS and NSF Proposals. This process is managed by NIMR's Grants Unit.

5. **As Part of the Grant Process Administered by NIMR.** All PIs submitting proposals to for NIMR funding must submit a Principal Investigator Certification on Investigator Conflict of Interest.
6. **In Public Forums.** Covered Individuals who submit works for publication, formally present research results or provide expert commentary on a subject must disclose any interest they hold in a Business that owns or has a contractual relationship related to the technology being reported or discussed or which sponsored the research being reported. Covered Individuals are also responsible for compliance with the disclosure rules of all other academic forums such as journals and professional associations.
7. **At the Time Purchasing Decisions are Made.** When a Covered Individual or Family Member has an Outside Interest in an organization that offers goods or services that NIMR purchases and the Covered Individual has the authority to influence business decisions involving the organization, the Covered Individual must disclose the Outside Interest at the time related business decisions are being made, must recuse him or herself from the decision-making process and the recusal must be documented.
8. **At the Time Hiring Decisions are Made.** When a Covered Individual has a personal or family relationship with a job candidate and the Covered Individual has the authority to influence the hiring decision of that candidate, the Covered Individual must disclose the relationship at the time hiring decisions are being made, must recuse him or herself from the decision-making process and the recusal must be documented.
9. **At the Time a Protocol is Submitted to an Institutional Review Board (IRB).** All Institute Members, Adjunct Researchers and other NIMR principal investigators will comply with the disclosure requirements of any of the IRBs reviewing work on behalf of NIMR. NIMR, in turn, will provide any such IRB with information regarding any management plan the Institute Member, Adjunct Researcher or other principal investigator is operating under. It will be the applicable IRB's decision to approve the research based on this information. The IRB of record will also inform NIMR if it determines that the management plan is inadequate.

Disclosure requirements are met when a Covered Individual has accurately completed, signed and filed NIMR Outside Activities Disclosure Form with the CRO and when the information on the form is current. The form is available at <https://nimr.gov.ng/policies/>. Paper versions are available through the Compliance Officer. **Adjunct Researchers may submit copies of comparable disclosures made at their home institution, in lieu of the Outside Activities Disclosure Form, as long as they contain substantially the same information as is required under this policy.**

All Covered Individuals have a responsibility to respond fully and in a timely manner to inquiries from the CRO in connection with a disclosure under this policy. Failure to follow the certification

and/or disclosure procedures may result in disciplinary action, including but not limited to limiting the Covered Individual's research privileges or termination of employment.

Review and Management of Conflict of Interest and Conflict of Commitment Disclosures

Objective Standard: The CRO will make a determination as to whether a Conflict of Interest or Conflict of Commitment exists based on the facts and circumstances surrounding the situation.

A Conflict

of Interest or Conflict of Commitment depends on the situation, not on the character of the individual and the mere existence of a conflict does not necessarily imply wrongdoing. The paramount concern is proper disclosure in order to appropriately manage the situation and avoid any impermissible conflicts.

Other: Any other situation in which a Covered Individual or his or her Family Member has an Outside Interest that has the potential to affect work the Covered Individual performs for NIMR must be reviewed by the CRO, including any other situation where the Covered Individual perceives that the interest could be in conflict, or appear to be in conflict, with his or her job duties.

In the case of an institutional Conflict of Interest concerning human subjects research, the IRB reviewing the research protocol is responsible for the management of the Conflict of Interest. The IRB may, from time to time, consult with NIMR's CRO and CAC with respect to such matter. It is the responsibility of Covered Individuals to comply with this policy and any policy set forth by the relevant IRB to determine the relatedness of any financial interest to any proposed human subjects research. Covered Individuals may consult with the CRO regarding any relatedness matter.

Disclosure Review and Reporting Obligations

All disclosures shall be reviewed by the CRO in a timely and objective manner to determine if a conflict appears to exist. The CRO may call upon the Conflict Review Advisory Committee (CAC) and other internal and external advisors for advice in the review.

In the case of Sponsored Research, if a Conflict is identified, the CRO shall require any and all actions necessary to ensure that the Conflict found will be eliminated, reduced or otherwise appropriately managed, before funds are expended under an award (or within 60 days if the Conflict of Interest is identified after the initial report has been made under an award).

In those instances where federal funding is involved, NIMR will take any action required under federal law and/or regulation to notify the appropriate agency when any Conflict arises and provide assurance that appropriate steps have been taken to safeguard the research.

In those instances where a Covered Individual is the employee of a NIMR Partner Institution, the Compliance Officer will notify NIMR Partner Institution that a Conflict appears to exist and identify the actions necessary to eliminate, reduce or otherwise appropriately manage the Conflict at NIMR.

Compliance and Follow-Through

All Covered Individuals shall promptly take such actions that may be determined by the CRO to manage, reduce or eliminate a Conflict of Interest or Conflict of Commitment or shall otherwise eliminate the conflict. Where federal funding is involved, any Conflict shall be resolved by management, reduction or elimination of the Conflict, prior to the expenditure of federal funds. Possible management of the Conflict may include, but is not limited to, public disclosure of the Significant Financial Interest, monitoring of research by independent reviewers, modification of research plans, disqualification from participation in federally funded research, divestiture of the Significant Financial Interest and severance of relationships that created the Conflict. Subsequent to the first expenditure of funds under a federal award, all applicants receiving such an award shall (i) comply with disclosure requirements of this policy during the term of the award and (ii) promptly take such action imposed by NIMR to manage, reduce or eliminate any Conflict that arises during the term of the award or otherwise eliminate the Conflict.

Failure to Comply

Failure by a Covered Individual to complete the necessary forms or comply with a management plan may result in disciplinary action, including, without limitation, relinquishment of appointment as Fellowship or Adjunct Researcher of NIMR, limiting the individual's research privileges, reassignment, demotion and termination of employment.

Review of CRO Decisions

Any determination and/or recommendation made by the CRO with respect to a Covered Individual is subject to review by the Director or by the Board of Directors or committee thereof, based on recommendation of the CAC.

Subrecipient compliance

When working with a subrecipient, a written agreement will be put in place to clarify: (a) which organization's (prime awardee or subrecipient) FCOI policy will be followed, and, (b) in either case, clarify the timeline for disclosure and reporting. Note that the prime awardee is responsible for monitoring subrecipient's compliance with the Financial Conflict of Interest regulation, management plans, and for reporting all identified financial conflicts of interest.

Record Retention

Records of all disclosures and NIMR actions under this policy will be maintained for at least three (3) years, or as otherwise required by federal regulations.

Public Accessibility

As required by PHS regulation, NIMR's FCOI policy will be made accessible on NIMR's website (or any other unit of NIMR that receives PHS funded grants). If a PHS-funded investigator holds

financial interests that are determined to be FCOI, as required by PHS regulation, these will also be posted on the web site, as follows:

1. Include the minimum elements required by the regulation;
2. Update within sixty (60) days of a newly identified FCOI;
3. Update annually; and
4. Remain available for three (3) years.

TABLE OF ACRONYMS

CAC – Conflict Review Advisory Committee
CRO – Conflict Review Officer
ELT – Executive Leadership Team of NIMR
NIH – National Institutes of Health
NIMR – Nigerian Institute of Medical Research
NSF – National Science Foundation
PHS – Public Health Service
PI – Principal Investigator

CONTACTS AND SUBJECT MATTER EXPERTS

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References

1. 45 CFR 94 – Responsible Prospective Contractors
2. Redeemer’s University PHS Financial Conflict of Interest Policy
3. Oregon Health Authority DHS Policy Template

Policy History

10/2021



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