Streamlined Conflict-of-Interest Solution at Yale University

THE OPPORTUNITY

Yale University has been conducting a multi-year review of all aspects of its administration to improve service, increase efficiency and provide a more user-friendly systems-support environment for the research faculty and support staff.

The university's conflict-of-interest reporting process was viewed as among the most critical areas that needed to be reviewed and changed. Yale believed that reducing the administrative burdens on faculty and other research staff would ultimately lead to increased efficiency and compliance. Based on the initial assessment, it was confirmed that the existing conflict-of-interest forms were a challenge – they were complicated, repetitive, and considered a point of intense dissatisfaction for faculty and others involved in research. Yale wanted a streamlined and comprehensive solution that would make the process of completing the conflict of interest forms less cumbersome. If that could be achieved, Yale believed that compliance with guidelines of both the university and the sponsors would be more robust.

THE APPROACH

Huron Education facilitated the process of examining all Yale requirements concerning conflict of interest and found that the university's policies on disclosure were often more strict than those of federal regulators or research sponsors. Huron collaborated with the Office of Research Administration to evaluate whether the increased disclosure requirements were of any real benefit to Yale, and given the increased administrative burden, if all regulations and requirements could be met with fewer resources.

In examining Yale's process for managing conflicts of interest, Huron and Yale identified several areas for improvement, including:

– Multiple functional units administered conflict-of-interest policies, impeding coordination and the flow of information, and, ultimately, increasing administrative costs

– Faculty members and researchers often had different roles across several research projects, which resulted in confusing messages about disclosure and responsibility for managing conflicts of interest

– Disproportionate resources were spent on relatively low-risk disclosures

– There was a lack of documented standard procedures for reviewing conflicts of interest and a lack of understanding of roles and responsibilities for assuring compliance

– The previous disclosure system was housed on an outdated technology

– The forms were completed online but the internal system continued to rely on paper documentation and lacked integration with other research units

Huron worked closely with Yale to eliminate as much administrative burden as possible from the faculty and provide a stronger "one-stop shop" service model. Huron and Yale developed training and communications to provide clear and concise information regarding the new conflict-of-interest process to all faculty and participants in research administration.

> "The new conflict of interest system shortened the time required for annual disclosures and has significantly reduced the burden on our faculty. In addition, the ability to interface with our pre-award system facilitates our ability to compare financial disclosures with awards."
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> Andrew B. Rudczynski
> Associate Vice President for Research Administration
> Yale University

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THE RESULTS

Yale modified its conflict-of-interest policy and streamlined processes, while working extensively with Huron to design, test and deploy a new system. Huron and Yale worked with the software vendor to ensure the configurations and customizations of the system would comply with the vision for the modified conflict-of-interest policies and procedures at Yale.

The new conflict-of-interest solution at Yale was fully implemented in May 2010. Since then, more than 7,500 disclosures have been submitted through the system, representing more than 7,300 faculty and research staff members. The comprehensive solution — including new policies, procedures, training and systems — were adopted and quickly accepted by faculty and personnel.

Highlights of the improvements realized by the new solution include:

– Faculty members, principal investigators and research personnel can easily meet institutional and funding source COI requirements by completing and/or updating a single disclosure form.

– The form was reduced from 20+ pages to a few pages, with fewer questions, while still capturing detailed information, satisfying both Yale and federal requirements. Utilizing branching logic, only relevant questions are asked based on responses to previous questions and the form can be completed online from virtually anywhere. When completing new documents or annual updates, the form pre-populates answers previously submitted by the user.

– The central administration of all conflict-of-interest forms provides more consistency, transparency, and ease of tracking among all research units at the university. Details and outcomes of COI reviews conducted on sponsored research awards are now readily available and easily reportable.

– The integration of disclosure information and pre-award data on a single software platform provides transparency and streamlines the processes between research administrative units, while assuring compliance with federal regulations.

– Extensive communications and change management materials created for end-users fostered a culture of compliance and built a foundation that could be used for future new-hire training and ongoing support.

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