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When Interests Intersect: Managing Conflicts of Interest and Commitment in Research

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Disclaimer:

The opinions expressed in this presentation are solely that of the presenter and not of any particular institution.

I have no Conflicts of Interest to declare in conjunction with this presentation.

Learning Objectives

1. Differentiate between conflicts of interest and conflicts of commitment and explain why each matters for research compliance and integrity.
2. Apply institutional and regulatory expectations to identify, disclose, and appropriately manage common conflict scenarios in academic research settings.

Why this Matters

01

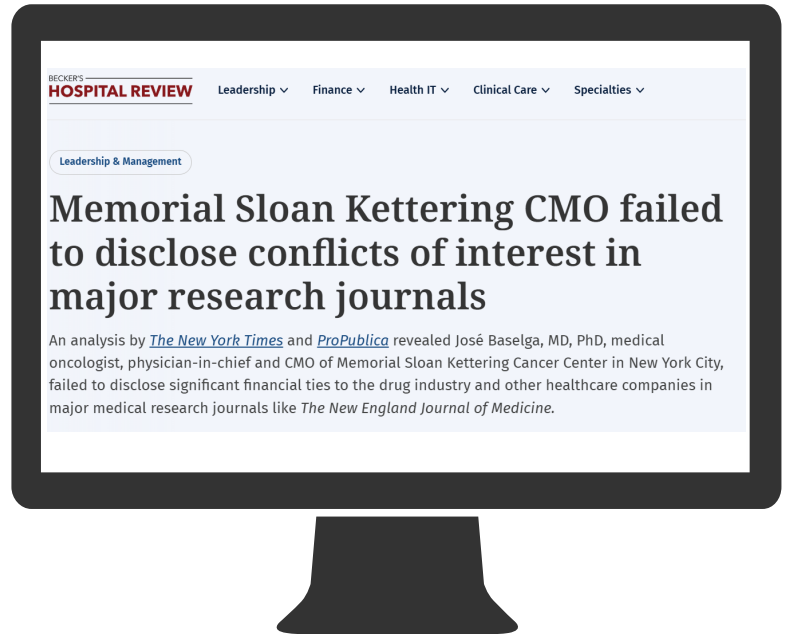
Proposal = First Opportunity to Identify Risk

02

Errors Here Follow the Project Lifecycle

03

Pre-award is a Critical Control Point



Key Definitions

Conflict of Interest (COI)

When outside interests—like financial relationships or personal connections—**could affect, or seem to affect, a researcher’s decisions or objectivity.**

Financial/personal interests that may bias research

Conflict of Commitment (COC)

When a researcher’s outside activities or obligations **interfere with, or appear to interfere with, their ability to meet their institutional responsibilities—especially their time and effort on research.**

Competing time/effort obligations

BOTH IMPACT RESEARCH INTEGRITY AND COMPLIANCE!

COI vs. COC

COI → Risk of **bias**

Question to ask yourself:

What could influence decisions?

COC → Risk of **overcommitment**

Question to ask yourself:

Do they have capacity?

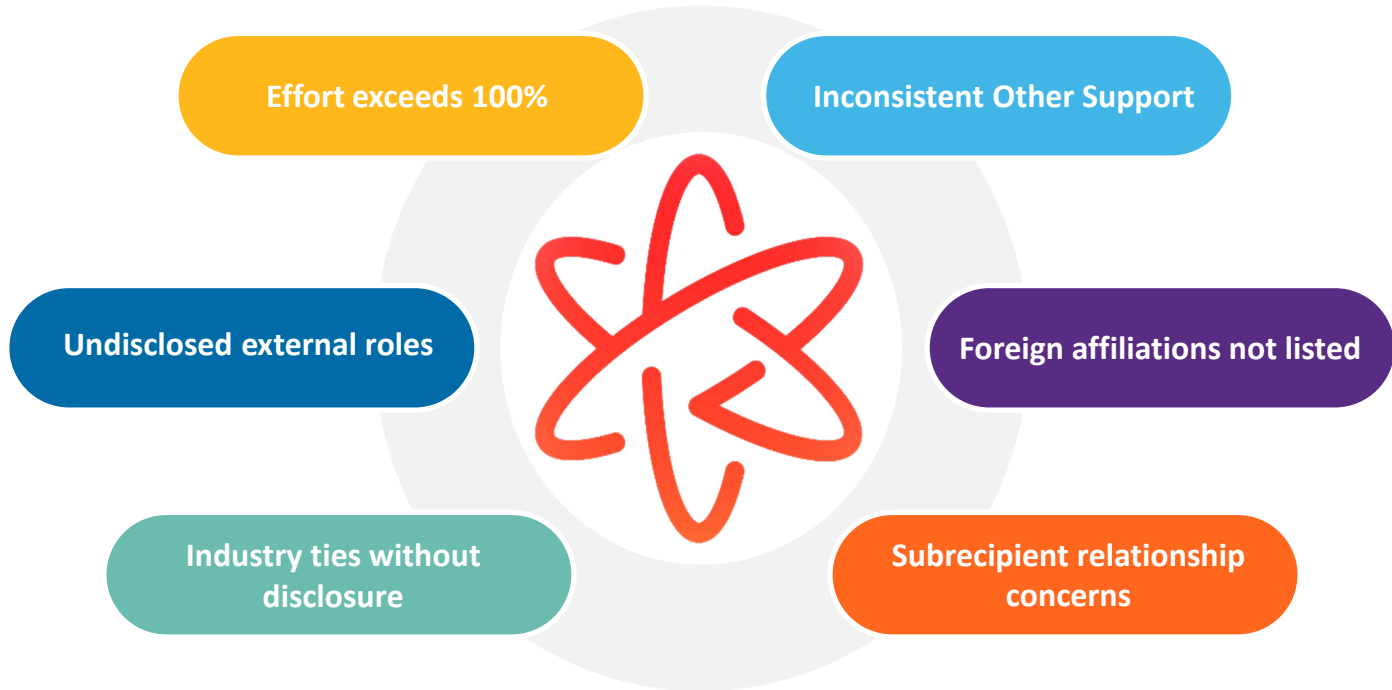
Where Conflicts Appear in Proposals

- Other Support/Current & Pending Support
- Budget & Effort Commitments
- Biographical Sketches
- Subawards and Collaborators
- External/Industry Relationships



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Pre-Award Risk Indicators



Effort & Commitment Risks (COC)

What should I look for?

- Overlap across projects
- “Voluntary”
uncommitted effort
- Effort not aligned with
role
- Key personnel
overextended
- Institutional effort
policies not met

Financial & Relationship Risks (COI)

What should I look for?

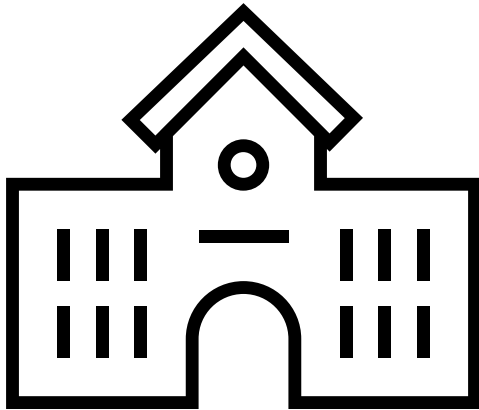
- Equity in sponsoring company
- Paid consulting related to research
- Intellectual property interests
- Family or personal relationships
- Sponsored research overlap

Regulatory Expectations

- Full and accurate disclosure
- Alignment across all proposal components
- Timely updates (e.g., Just-in-Time)
- Sponsor-specific requirements



Institutional Responsibilities



- Maintain disclosure processes
- Review and assess conflicts
- Implement management plans
- Ensure compliance before submissions

Pre-Award Analyst Role in Compliance

Review Checkpoint

Review for
completeness
and
consistency



Flag Issues

Identify
potential
conflicts early



Route

Route issues
to appropriate
offices

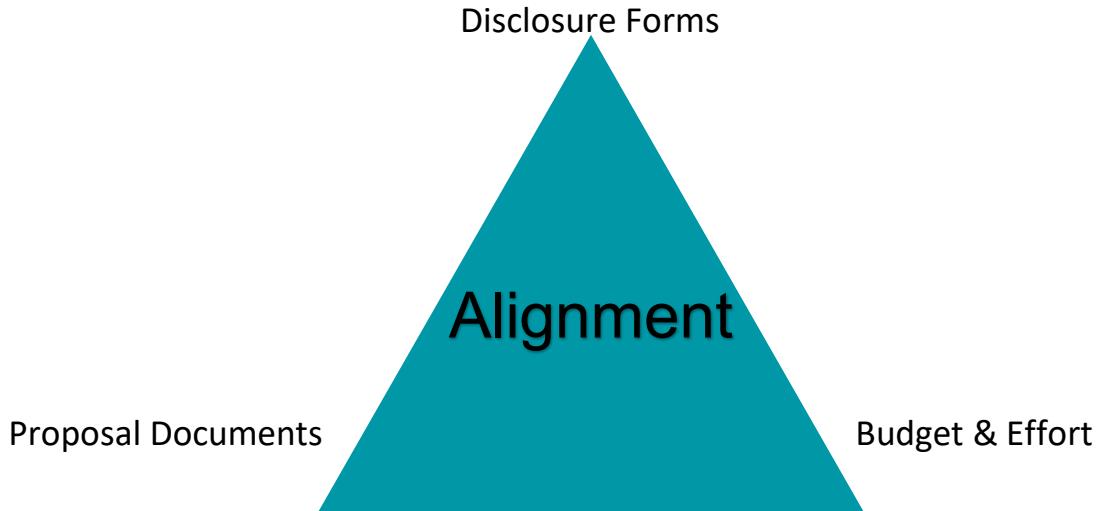


Document

Document and
review
decisions



The Alignment Check



Inconsistencies = Compliance Risk
Consistency = Defensibility

Scenarios

Scenario 1 – Effort Conflict

- You observe a PI that will exceed 100% total effort across all their projects
- Multiple overlapping commitments exist
- What questions should you ask?
 - Is existing and proposed effort realistic?
 - Is overlap allowable?
- What action should be taken?
 - Clarify and document before submission

Scenario 2 – Financial COI

- A PI has equity in the sponsor of the proposal being submitted
- This equity is not reflected in the disclosures

- What risks exist?
 - Bias
 - Audit findings

- What action should be taken?
 - Confirm disclosure and escalate

Scenario 3 – Other Support

- Document has missing or incomplete entries
- Foreign or external support not listed

- What risks exist?
 - Noncompliance with sponsor rules

- What action should be taken?
 - Verify and reconcile inconsistencies

Strategies and Best Practices

Practical Pre-Award Strategies



Use standardized checklists



Cross-check all proposal components



Ask clarifying, neutral questions



Build COI/COC into workflow



Document all decisions

Communication Best Practices

Instead of this....	Say this....
This isn't compliant.	Can you help me understand how this aligns?
This is missing.	I may be missing something – can we walk through this?
You need to fix this.	Let's make sure this lines up before submission.
This is a problem.	I want to flag something early so we can address it.

Focus on alignment, not fault

Key Takeaways

- COI/COC are common and manageable
- Proposal stage = best control point
- Alignment across documents is critical
- Documentation supports defensibility
- Pre-award teams are essential to compliance

Discussion and Thanks!!

- Where do you see the most challenges?
- What tools or processes help?



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