COI Tip Sheet

Ensuring Appropriate Disclosures in Publications

The Lundquist Institute expects its investigators and employees to appropriately disclose financial and other interests in publications according to publisher guidelines. Since outside financial interests of investigators and employees are publicly available on web sites such as CMS Open Payments (for physicians and advanced practice providers as of 2022), it is imperative that every effort be made to ensure that disclosures are appropriate and accurate.

Steps to Ensuring Appropriate Disclosures

1) Review journal disclosure instructions carefully and follow all requirements, which will vary from journal to journal. Disclosures may also be called “conflicts of interest,” “competing interests,” or “financial interests.”

2) Review the Lundquist Institute’s Conflict of Interest (COI) policies and CMS Open Payments (for physicians), to identify all interests to disclose. Unless a journal requests disclosures for a specified time, disclosures should include all interests that were active during the planning, conduct, and reporting of the research.

3) Consider the following when determining what to disclose, including directly related interests, both financial and non-financial:
   a) Relationships and interests that could influence or bias the research, or appear to do so, including direct and indirect relationships (for example, serving on the Board of Directors for an association from which you are also a grant recipient).
   b) Research grants or support from funding agencies and associations, and any relationships with those groups.
   c) Financial support for speaking, travel, and/or training and educational programs.
   d) Employment or consulting activities, including Advisory Board service.
   e) Investment interests, ownership, patents held (if requested by the journal), or payments for intellectual property (IP).
   f) For human research, disclose interests related to manufacturers of drugs or devices discussed in the publication, even if the manufacturer was not a study sponsor or participant.

4) Follow any requirements for disclosure as provided to you in a Management Plan issued by the Lundquist Institute COI Committee (via Research Compliance Office). The COI Committee will periodically review disclosures in publications to ensure adherence to Management Plans.

5) As a general recommendation, disclose all interests unless otherwise prohibited by the journal.

6) If you are not the first author of the publication, and you have financial interests to disclose, ensure that you ask the corresponding author to include the financial interest and/or send you a pre-publication copy of the publication so a disclosure can be added.