

Charge & Procedures

The committee will: 1) review Conflict of Interest and Conflict of Commitment Disclosures that the Assistant Vice President for Research determines need further review, 2) seek the advice of the Office of General Counsel, Internal Audit, and other parties as appropriate, and 3) make recommendations to the Vice President for Research.

Possible recommendations include:

1. Approval of the employee's proposed management plan as submitted.
2. Modification of the employee's proposed management plan.
3. Proposal of an alternative management plan that properly addresses conflict of interest or time commitment; or
4. No management plan is practicable.

The Vice President for Research will make the final decision.

Members, Terms of Office:

Standing members (role-based, ex officio):

- Assistant Vice President for Research
- Director IRB
- Director of Compliance
- Assistant Dean for Research (3-year staggered terms)
- Department head or College Dean or designee (3-year staggered terms)
- Faculty Member (3-year staggered terms)
- Junior Investigator or Clinician

Chair: Assistant Vice President for Research

Reports to: Vice President for Research

Reviewing Conflict of Interest and Conflict of Time and Commitment Disclosures

1. Evaluation.

The committee should review all relevant information. They must first determine if there is legitimate cause for concern related to the inappropriateness of behavior or evidence of bias by the professional activities of the employee or the potential therein. The COI Committee considers disclosures associated with research projects on a case-by-case basis. The COI Committee conducts the review process in a manner that is intended to foster, not hinder, research relationships.

If the COI Committee determines that the disclosed interest does not affect the research, or that the interest does not compromise the commitments of the individual to OUHSC, and is not detrimental to OUHSC, the COI Committee usually determines that no conflict exists.

If the COI Committee determines that the disclosed interest could influence the research, the COI Committee usually decides that a conflict exists. Committee members then usually propose a resolution strategy to manage the conflict. In some rare instances, the COI Committee determines that the conflict is unmanageable, and that the research cannot proceed unless the investigator either eliminates the conflicting interest or situation, or does not participate in the research. During the process, the investigator may also be invited to meet with the COI Committee or a subcommittee to discuss ways to manage the potential conflict.

The following questions are suggested for this initial determination.

- Has all the relevant information concerning the employee's activities been acquired (i.e., has there been full disclosure)?
- Do the employee's relevant financial interests suggest the potential for conflicts or the appearance of conflicts or bias?
- Is there any indication that the employee in his or her professional role has improperly favored any outside entity or appears to have incentive to do so?
- Has the employee inappropriately represented the University to outside entities?
- Does the employee appear to be subject to incentives that might lead to conflicts or bias?
- Is there any indication that obligations to the University are not being met?
- Is the employee involved in a situation that might raise questions of bias, inappropriate use of University assets, or other impropriety?
- Could the employee's circumstances represent any possible violation of federal or state requirements?
- Do the current engagements of the employee represent potential conflicts between outside interests (e.g. working on projects simultaneously for competing business entities?)
- Could the proposed activity withstand public scrutiny?

2. Initial Recommendations

Most situations will be found to be one of the following:

- Permissible, since the disclosed information does not represent a possible source of bias or an inappropriate activity;
- Permissible, with modifications aimed at avoiding bias or inappropriate activities; or
- Inconsistent with University policy and thus not permissible.

3. In cases in which faculty activity is permitted, but requires modifications.

Recommendations are as numerous as the different types of situations that the committee may review.

Possible options include:

- public disclosure of all relevant information
- reformulation of the research work plan
- close monitoring of the research project
- divestiture of relevant personal interests
- termination or reduction of involvement in the relevant research project
- termination of inappropriate student involvement in projects
- severance of outside relationships that pose conflict
- supervision or review of project by an independent party
- employee reimbursement to the University for indirect costs and for the use of laboratories, equipment, facilities, and other resources.

Additional Input on Management Plans: In making review and management decisions, the COI administrators may consult with others on an as-needed basis. These others may include campus administrative offices, University Counsel, and the Senior Vice Provost for Research, as well as research personnel (and/or spouses/domestic partners/dependent children, if applicable) and unit heads, particularly when the management plan will likely require unit-level implementation and/or monitoring.

4. Management Plan Notification.

If approved by the VPR, a decision memo will be e-mailed to the disclosing parties, the PI, and the investigator's Department Chair, if appropriate. ORA, GCA, Purchasing, the IRB, and IACUC are informed as applicable, via e-mail.

Notification of approval and a copy of the management plan are sent to the research personnel involved, the unit head, and those responsible for implementation of the management plan. In addition, sponsors will be notified of the existence of a managed conflict, if the regulations of that agency or award so require.