

## **PROCEDURES ON DISCLOSURE AND MANAGEMENT for Conflict of Commitment and Conflict of Interest**

(Revised April, 2009)

Annually, beginning July 1, each Individual will complete an online disclosure of his/her significant financial interests and conflicts of commitment after e-mail notification by the Office of Research. All disclosures are submitted by Individuals electronically via an easily accessible online process. The annual disclosure must be reviewed by the Individual's department chair, section head or supervisor after submission. *At any time an event causes a substantial change in external activities, Individuals are required to electronically update their disclosure within 30 days.*

An electronic database of annual disclosures and their reviews will be maintained by the Office of Research. The reports and the database will be accorded the same confidentiality as personnel records and will be kept on the file server for at least three years after the date of submission of the final expenditures report or, where applicable, from other dates specified in 45 CFR 74.53(b) for different situations.

### **Disclosure of Conflicts of Commitment:**

1. Individuals will report their conflicts of commitment as described in the policy.
2. If an individual needs more time commitment to an outside entity than the department-established threshold, he/she should seek prior approval in writing from his/her department chair or supervisor.
3. Disclosures containing real or apparent conflicts of commitment will be addressed by the Individual's department chair or supervisor.

### **Disclosure of Conflicts of Interest:**

1. Individuals will report their conflicts of interest as described in the policy.
2. The Office of Research conflict of interest staff shall conduct an initial review of the annual financial disclosures.
3. If it appears that there may be a conflict of interest as described in the policy, the Individual will address and manage the conflict as described in the procedures below.

### **Management of Conflicts of Commitment:**

1. Each department chair and supervisor has the ability and responsibility to decide the threshold of days outside of the office allowed for his/her faculty and staff members based on clinical needs, etc.
2. If it appears there may be a conflict in the number of days required for outside activities for a faculty or staff member, the department chair and/or supervisor has the responsibility to discuss the conflict with the Individual to resolve it.

### **Management of Conflicts of Interest:**

1. Potential conflicts will be referred to the Conflict of Interest Review Committee (CIRC), a standing committee appointed by the Dean/President. The CIRC shall consist of, at a minimum, six faculty members representing a cross section of clinical and basic science

disciplines, and administrators from the Office of Research.

2. A conflict of interest will be deemed to exist when the CIRC *reasonably* determines that a Significant Financial Interest could directly and significantly affect the design, conduct, or reporting of the proposed sponsored project, or an educational or consulting arrangement. COI staff will have access to the IRB database, grants and industry relations route forms, and purchase orders to identify potential conflicts of interest. The Committee shall then determine what conditions or restrictions, if any, should be imposed by the institution to manage a conflict of interest arising from a disclosed Significant Financial Interest.
3. Prior to consideration by the CIRC, the individual, in cooperation with the department chair or supervisor, shall develop a conflict management plan to manage, reduce, or eliminate any conflict of interest presented by a Significant Financial Interest. Resources for faculty and staff to develop the management plan are available on the Office of Research web site. The CIRC will review the management plan and make any changes it considers necessary to manage, reduce, or eliminate the conflicts of interest.
4. The management plan details the conditions or restrictions imposed upon the Individual in the conduct of the project or in the relationship with the business enterprise or entity. The plan shall be signed by the Individual, the department chair or supervisor and, on behalf of the School, by the CIRC Chairman and Dean/President or his designee.
5. Conflicts of interests will be satisfactorily managed, reduced, or eliminated in accordance with this policy within 60 days of identification by the institution, and all reports required regarding the resolution of the conflict of interest will be submitted to the sponsor *prior to* expenditure of any funds under an award. NIH requires the School to report to the NIH Awarding Component the existence of a conflicting interest (but not the nature of the interest or other details) found by the School and assure that the interest has been managed, reduced, or eliminated. NSF only requires the School to report conflicts that cannot be satisfactorily managed, reduced, or eliminated.
6. The CIRC will communicate management of relationships involving conflicts of interest in human subjects research effectively and efficiently to the Institutional Review Board. Notification of final actions taken by either committee will be communicated via electronic memo. The senior IRB regulatory staff member, or delegated representative, will attend CIRC meetings as a non-voting member.
7. Records of individual financial disclosures and of actions taken to manage conflicts of interest shall be retained by the Office of Research until at least three years after the date of submission of the final expenditures report or, where applicable, from other dates specified in 45 CFR 74.53(b) for different situations.
8. Collaborators/subrecipients/subcontractors of a research project must provide a certification from their institutions to WFUSM that they are in compliance with applicable Federal policies regarding individual Significant Financial Interest disclosure and that their portion of the project is in compliance with their institutional policies, or comply with this policy.