

Conflicts of Interest Management Plan Template

TERMS OF MANAGEMENT PLAN:

- Management Plan shall be effective the date of the last signature for a period of one year after which it must be updated annually.
- Management Plan may be terminated:
 - upon execution of a superseding Management Plan;
 - at such time as University determines no further Management Plan is required under the University Conflict of Interest Policy;
 - if employee elects to disengage from external activity; or
 - if there is failure by employee to comply with the terms of the Plan

MANAGEMENT PLAN: The Plan should include:

- Name and role of the employee on the project
- Description of the external relationship(s) with which employee has a potential or actual conflict
- Nature of the conflict
- Describe any research support (*grants, contracts, unrestricted gifts, or material*) that the company will offer to the University.
- Individual(s) who could serve as a monitor, if warranted. Additionally, documents that would be appropriate for review by the monitor.
- Declaration of how the activity(s) will be conducted to reduce the potential for bias/conflict.
- Describe interaction with students and other personnel, including supervisory responsibilities, graduate students and employment of students by the outside company named in the management plan.
- Provide information on financial conflicts of interest to students, trainees, and other employees participating in external companies work. The information should include explanations of the relationship with the entity and the right of students and other personnel to take concerns about the effect of the employee's relationship with the entities on their work, studies, or progress towards degree, to their dean, chair or director. (sample notification located at the end of document)
- Explain how publications and presentations will be presented, and the relationship between the company and the University.
- Describe any involvement in decision making regarding purchases that concern the company.
- Any activity involving the use of University facilities or services for the benefit of the above mentioned company will be conducted in accordance with all relevant policies pertaining to the use of University facilities. Provide for the use of a written facilities use agreement to be approved by the University of Conflict of Interest Committee for review, and the individual in charge of approaching use of facilities, services or resources before an activity begins. This element is only applicable to researchers with interests in outside entities.

MANAGEMENT AND OVERSIGHT: Some actions to consider in managing conflict of interest/commitment include:

- Requiring that the financial interest be divested or restructured
- Modification or severance of the financial relationship
- Disclosure and/or review of relevant publications prior to submission

- Non-participation of the employee in any business transactions between the conflicted employee and the business entity.
- In the case of human subjects, see management plan template at: <http://www.southalabama.edu/researchcompliance/forms.html> The Institutional Review Board oversees the management of human subject research projects that involve financial conflicts of interest. Such as example would be consideration regarding appropriateness of contact, recruitment and consent of subjects by conflicted individuals.
- Removing purchasing decision authority
- Reducing the percentage of the employee's USA appointment to accommodate the outside interest or activity.
- A leave of absence with or without pay
- Prohibiting certain outside activity as inconsistent with the employee's obligations to the University

ANNUAL REVIEW: Include a provision for an annual meeting with the department chair and/or Dean of the College to review this information:

- At a minimum, conduct an annual review on the management of an active conflict and document. More stringent requirements may apply.
- Provide for an update of the disclosure due to any significant change in relationships.

**SAMPLE NOTIFICATION FOR INFORMING
Students and Staff of Potential Conflicts of Interest**

I will hold annual meetings with members of my USA research group (students and staff) to explain my potential or actual financial conflict of interest, communicate the details of the Plan provisions related to my research with the Intellectual Property, and allow participants to ask questions. I will speak individually with any new employee joining my research group to convey this information. Annually, I will provide to the independent reviewers a list of individuals who have received the information.

I will follow these meetings with a written summary of the information for each USA student or staff member participating in this award. This is an example of the written summary I will use:

Dear Staff/Students,

For your information, I serve as (a consultant to) (a board member of) (an executive officer of) COMPANYNAME. I also receive research grant funding from (company name) investigating (briefly describe the research area). This relationship has been identified as having the potential to create a conflict of interest with my responsibilities as a faculty member. I have fully disclosed these interests to the University of South Alabama, and I have in place an approved plan for managing any potential conflicts arising from this involvement. To manage this financial (potential) conflict, it is my responsibility to ensure that an independent review of my work is conducted annually.

I understand that your work on the project, (insert project name), should be for academic reasons to further your studies and your professional career endeavors. If at any time you have any concerns about whether your work is inappropriately focused toward my outside relationship(s), or that your ability to publish has been impeded in any way, I encourage you to contact the Department Chair or (alternative advocate for the student) (include names and phone numbers, if not evident).

Sincerely,

[Researcher's Name]
[Researcher's Title]

Acknowledgment: Notification developed by University of Mississippi