

UNH Financial Conflict of Interest in Research

Administrative Procedures

1. OSR Research Administration staff require COI certification on proposal routing form (“yellow sheet”) before submission of proposals.
 - Refer questions on policy to staff of SVPR
 - Inform PI’s of location of disclosure form & instructions on the web
 - Encourage PI’s to ensure all necessary disclosures are submitted

2. A. PI **without** significant financial interest related to the proposed research has no further responsibilities other than filing a disclosure should s/he acquire reportable financial interests.

- B. PI **with** significant financial interests possibly affected by the proposed research submits a financial disclosure statement, any clarifying documentation, and a draft conflict management plan, in a sealed envelope to the SVPR.
 - 1) SVPR receives envelope:
 - SVPR staff conduct triage process:
 - Determine applicability of FColiR policy (e.g., not purchasing)
 - Ensure essential information has been provided; check facts
 - Clarify roles and relationships
 - Make recommendation for next steps to SVPR
 - If possible COI, notifies OSR Executive Director of PI name, proposal title, agency.
 - No funds may be spent from an award until the Disclosure Review Committee (DRC) has reviewed the disclosure statement, determined whether a conflict exists, and if so, overseen establishment of a conflict management plan. (Note that PHS requires interim action within 60 days following identification of a conflict);
 - If indication of human subjects, SVPR staff notifies chairperson of IRB.
 - SVPR convenes the DRC when it appears the proposal may be funded.

 - 2) The DRC meets:
 - If the DRC determines a conflict exists, the proposed conflict management plan is finalized in conjunction with the PI ;
 - SVPR staff record and securely maintain meeting minutes;
 - SVPR staff communicate meeting results with PI and OSR Exec Dir, especially regarding status of conflict management plan;
 - OSR Exec Dir communicates with relevant GCA;
 - OSR Exec Dir communicates with sponsors when necessary (PHS is notified of all PHS-related conflicts; NSF is notified if an NSF-related conflict cannot be managed).
 - If indication of human subjects, SVPR staff communicate results with IRB chair.

 - 3) Conflict management plan and monitoring system is put into place;
 - Spending may commence

- 4) Updated disclosure forms must be submitted to the SVPR if an investigator's relevant financial situation changes.

Acronyms:

COI ~ Conflict of Interest

FCoIiR ~ Financial Conflict of Interest in Research

GCA ~ Grant and Contract Administrator (in OSR)

IRB ~ Institutional Review Board for the Protection of Human Subjects in Research

NSF ~ National Science Foundation

OSR ~ Office of Sponsored Research

PI ~ Principal Investigator

PHS ~ Public Health Service

SVPR ~ Senior Vice Provost for Research

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