

## **Conflict of Interest in Research and Development - Disclosure Process**

- 1.** A conflict of interest (COI), or a potential conflict of interest, in research and development is identified by a Department Chair, unit head, faculty member, or another university individual.
- 2.** It is highly recommended that the faculty member or individual with the COI/potential COI seeks guidance and input by COI Committee Members and the Office of Technology Transfer.
- 3.** The faculty member or individual with the COI will complete a Conflict of Interest Disclosure Form, and submit it to their Department Chair/unit head. The form is available from the Morgan website link of the Division of Research and Economic Development.
- 4.** The Department Chair or unit head will review the information provided on the disclosure form and any accompanying attachments to ensure that it is complete. They will indicate their conclusion on page one of the form as to whether or not a real or potential conflict of interest exists; and if so, whether the COI Management Plan described will permit the conflict to be managed in accordance with University policies and procedures. The Department Chair or unit head will then sign the COI Disclosure Form and forward it to the Dean, within 10 business days of receipt.
- 5.** The Dean will review the information provided on the disclosure form, indicate concurrence or non-concurrence with the conclusions of the Chair or unit head, and forward the form to the Vice President for Research & Economic Development, who serves as Chair of the Conflict of Interest Committee and University COI Designated Official, within 5 business days of receipt.
- 6.** The COI Official will review the disclosure form. If there is no COI in R&D the Official will notify the Dept. Chair, Dean, and the discloser in writing (6a), and no further action is required. If there is a conflict or potential conflict that must be reviewed by the COIC, the COI Official will assign the disclosure form and any related materials to the COIC committee for review, within 5 business days of receipt (6b).
- 7.** Within 30 Days, the COIC will review the COI Disclosure Form and any related materials, including a COI Management Plan, and determine whether a COI exists. When it is determined that a COI exists and cannot be managed, the COIC shall inform the discloser, Dean, and Department/Unit Chair in writing, that a COI Exemption is not being recommended (7a). The submitter may resubmit a new COI Form. When the COIC concludes that there is not a COI under the circumstances described, the COI Official will so notify the discloser, the Chair, and the Dean in writing(7b). No further action is required.
- 8.** When the COIC determines that there is a conflict, but it can be managed under a set of conditions, the conditions are set forth in a COI Management Plan, approved by the COIC.
- 9.** Upon a majority vote of the COIC to recommend the submission for approval of a COI Exemption, the COI Official shall prepare and forward an Exemption Recommendation to the President within 5 business days.
- 10.** When the President does not approve of the Exemption, the COI Official reports it in writing to the discloser, Department/Unit Chair, and Dean within 5 business days.
- 11.** When the President approves of the Exemption, the COI Official informs the discloser, Department Chair unit head, and Dean, in writing, within 5 business days. The COI Official (or designee) shall submit the exemption, in the University's quarterly report, to the State Ethics Commission (SEC).
- 12.** For all exemptions that have been granted, an annual updated COI Disclosure Form is required to be submitted by the discloser.
- 13.** All records are maintained in the COIC Case Files.