



University of Rochester Conflict of Interest Committee Charter

January 21, 2021

Purpose, Authority and Responsibilities

The University of Rochester Conflict of Interest Committee (the “Committee”) directs the University’s review, oversight and management of faculty, staff and institutional conflicts of interest related to research for all schools, colleges and divisions of the University.

The Committee has responsibility and authority to:

- Review financial and fiduciary interests disclosed by University faculty and staff to determine whether the interests may affect or be related to University research, and to identify actual or perceived conflicts of interest;
- Develop strategies for the management, mitigation or elimination of actual or perceived institutional, faculty and staff conflicts of interest related to research, including both sponsored and institution-funded research, and recommend them to the Deans, Provost and President, as applicable, for their approval;
- Advise the Board of Trustees and University of Rochester Medical Center Board with respect to financial or fiduciary interests that Trustees or Board members hold or propose to hold in companies that sponsor University research, license technology from the University, and on other matters related to conflict of interest;
- Monitor and oversee the implementation of and compliance with institutional and individual conflict of interest management plans, and recommend sanctions when non-compliance is identified;
- Develop, review and monitor University policies related to conflicts of interest in research;
- Stay informed of the relevant regulations, external guidelines, and current developments in the area of conflict of interest in research;
- Serve as a resource to the President, Deans, Department Chairs, the Board of Trustees, Medical Center Board, and others in the University community on issues related to conflict of interest in research; and
- Conduct or authorize investigations into any matters within its scope of responsibilities.

Composition

The Committee, and its Chair (or Co-Chairs), will be appointed by the University’s Senior Vice President for Research, and will include at least the following:

- two clinical research faculty members in the School of Medicine and Dentistry;
- one basic research faculty in the School of Medicine and Dentistry;
- one faculty member in the School of Arts and Sciences;
- one faculty member in the School of Engineering and Applied Sciences;
- one representative from the Laboratory for Laser Energetics (LLE); and

- one community member, i.e., an individual who is not affiliated with the University, who can provide a broader community perspective.

These numbers are intended as minimums, and not as limitations.

Other members may be appointed to the Committee, or to attend as guests on a regular basis or from time to time, at the discretion of the Senior Vice President for Research, including but not limited to representatives of:

- Data Science;
- the Warner School of Education and Human Development;
- the Simon School of Business;
- the Advancement Office; and
- the Communications Office.

In addition, the individuals in the following positions will serve on the Committee:

- University's Vice Provost for Research;
- University General Counsel;
- Director of the Office for Research and Project Administration;
- Director of UR Ventures;
- Chair of the School of Medicine and Dentistry Conflict of Interest Advisory Group (CIAG);
- the Dean of Research for the Schools of Arts, Sciences and Engineering;
- the Senior Associate Dean for Basic Research for the School of Medicine and Dentistry;
- the Senior Associate Dean for Clinical Research for the School of Medicine and Dentistry;
- the Associate Dean of Research for the School of Nursing;
- the Vice President for Government and Community Relations;
- the Director of the Office for Human Subject Protection; and
- the attorney in the Office of Counsel to the Medical Center who serves on CIAG.

Members will not serve in more than one category. For example, the Senior Associate Dean for Basic Research in the School of Medicine and Dentistry will not count as the SMD basic research faculty member.

Conflicts of Committee Members, Consultants, or Observers

Committee members must recuse themselves from Committee discussions and deliberations, at a Committee meeting or otherwise, on a particular matter under the following conditions:

- The individual has a direct personal financial interest with respect to the matter;
- Their Family Member has a direct personal financial interest in the matter;
- An individual who they directly report to, or who is their direct report, has a financial interest in the matter.

Committee members may also recuse themselves from other matters if they believe they may not be able to remain objective, or where they believe there may be an appearance of a conflict. The Committee may, in its discretion, invite a conflicted member to stay for the discussion of an issue, but they shall be recused from the meeting prior to the Committee's decision or recommendation. Recusal will be documented in the meeting minutes.

Support

The Senior Vice President for Research will appoint a COI Manager who will be responsible for coordinating and managing the process for reviewing COIs related to research. The COI Manager's responsibilities will include coordinating meeting locations and times; preparing meeting agendas and supporting materials; preparing minutes that include a record of topics discussed, and the Committee's conclusions and recommendations, including whether there was concurrence by all present on any actions and recommendations; communicating with individuals and offices responsible for distributing and collecting disclosures of financial and fiduciary interests related to research on behalf of the Committee; assisting and collaborating with Deans, Department Chairs, faculty and staff in determining whether arrangements may constitute actual or perceived conflicts of interest, and in developing conflict of interest management strategies and plans; communicating with other departments and offices about disclosed financial and fiduciary interests that may be potential conflicts of interest in areas other than research; overseeing the annual review and monitoring processes for conflict of interest management plans; and providing guidance on laws, regulations, guidance, and University policies on conflict of interest in research.