

University of Rochester

Policy

Faculty Conflict of Commitment and Interest

INTRODUCTION

These University of Rochester (“University”) policies and procedures governing faculty conflict of commitment and conflict of interest apply to all members of the University faculty, and may apply to students, post-doctoral appointees, residents, and staff. School deans or University counterparts, or their designees, are responsible for ensuring implementation of these policies and, when a conflict of interest is identified, may suspend all relevant activities until the conflict of interest is resolved or other action deemed appropriate by the Dean is implemented. Violation of any part of these policies may also constitute cause for administrative action as described in the Faculty Handbook.

Outside financial interests are common and often unavoidable in a modern research university. They can arise from the fact that one mission of the University is to promote the public good by fostering the transfer of knowledge gained through University research and scholarship to the broader world, which includes the private sector. Two important means of accomplishing this mission are faculty consulting and the commercialization of technologies derived from faculty research. It is appropriate that faculty be compensated for their participation in these activities through consulting fees and sharing in royalties and other financial benefits resulting from the commercialization of their work. It is not appropriate, however, for an individual's professional objectivity to be affected by considerations of personal financial gain.

While this policy addresses the management of conflicts of interest for faculty and other individuals, the University also has an obligation to ensure that its own financial interests are not inconsistent with or detrimental in any way to its core missions. The University has therefore adopted a separate Policy on Institutional Conflicts of Interest in Research addressing such situations.

DEFINITIONS

1. “Clinical trials” refers to all research studies that involve interaction with human subjects and the concurrent investigative use of drugs, biologics, devices or medical or other clinical procedures, such as surgery.
2. “Confidential information” refers to confidential information of the University. It includes, but is not limited to, medical, personnel, or security records of individuals; proprietary knowledge about anticipated material requirements or price actions; and proprietary knowledge of possible new sites for government operations or information about forthcoming programs or selection of contractors or subcontractors in advance of official announcements.
3. “Conflict of Interest Committee” (“COI Committee”) refers to the University committee that advises the Deans and Provost on conflict of interest matters. The committee

consists of at least five full-time faculty members appointed by the Provost, and others as deemed appropriate by the Provost. The Director of the Office of Research and Project Administration (“ORPA”) serves as an ex-officio, voting member of the committee. The Director of the University office of technology transfer, UR Ventures serves as an ex-officio, non-voting member of the committee. The Provost serves as an ex-officio, non-voting chair of the committee.

4. “Dean” refers to a school’s senior academic dean or University counterpart (such as Director of the Laboratory for Laser Energetics). This definition may include the person designated by the Dean to carry out the Dean’s responsibilities as prescribed in this policy. When the faculty member has appointments in more than one school or unit within the University, the responsible parties are then the Deans of each school or unit. If the conflicted or potentially conflicted faculty member is the Dean, the relevant decision-maker is the Provost or Senior Vice President for Health Sciences, as applicable.
5. “Faculty” refers to all individuals holding a paid academic, clinical, or research appointment with the University.
6. “Family members” refers to members of the immediate family, specifically dependent children, spouses, and domestic partners.
7. “Financial Interest” means anything of monetary value received or held by a faculty member, non-faculty Investigator or such an individual’s family member, whether or not the value is readily ascertainable, including, but not limited to: salary or other payments for services (e.g., consulting fees, honoraria, or paid authorships other than scholarly works); any equity interests (e.g., stocks, stock options or other ownership interests); and intellectual property rights and interests (e.g., patents, trademarks, servicemarks, and copyrights), upon receipt of royalties or other income related to such intellectual property rights and interests.

“Financial Interest” does NOT include:

- a) salary, royalties, or other remuneration that are paid by the University of Rochester;
- b) income from the authorship of academic or scholarly works;
- c) income from seminars, lectures, or teaching engagements sponsored by, or advisory committees or review panels for, Federal, state or local governmental agencies, U.S. institutions of higher education, research institutes affiliated with institutions of higher education, and academic teaching hospitals and medical centers; or
- d) equity interests or income from investment vehicles, such as mutual funds and retirement accounts, so long as the Investigator does not directly control the investment decisions made in these vehicles.

For Investigators whose research is funded through any unit of the Public Health Service, “Financial Interest” also includes any reimbursed or sponsored travel by the Investigator related to their institutional responsibilities. This includes travel that is paid on behalf of the Investigator as well as travel that is reimbursed, even if the exact monetary value is not readily available. It excludes travel reimbursed or sponsored by Federal, state or local governmental agencies, U.S. institutions of higher education, research institutes

affiliated with institutions of higher education, and academic teaching hospitals and medical centers.

“Significant Financial Interest” means a Financial Interest that reasonably appears to be related to the Investigator’s Institutional Responsibilities, and:

- a) if with a publicly traded entity, the aggregate value of any salary or other payments for services received during the 12 month period preceding the disclosure, and the value of any equity interest during the 12 month period preceding or as of the date of disclosure, exceeds \$5,000; or
- b) if with a non-publicly traded entity, the aggregate value of any salary or other payments for services received during the 12 month period preceding the disclosure exceeds \$5,000; or
- c) if with a non-publicly-traded company, is an equity interest of any value during the 12 month period preceding or as of the date of disclosure; or
- d) is income related to intellectual property rights and interests not paid by the University of Rochester.

Deans may adopt lower financial thresholds for determining that a Financial Interest is a Significant Financial Interest for some or all categories of research conducted within their respective schools. They will submit such policies to the COI Committee for its review and information.

“Financial Conflict of Interest” means a Financial Interest or Significant Financial Interest that the University reasonably determines could directly and significantly affect the design, conduct or reporting of University research.

8. “Institutional Responsibilities” refers to an Investigator’s professional responsibilities associated with his or her University appointment or position, such as research, teaching, clinical activities, administration, and institutional, internal and external professional committee service.
9. “Investigator” refers to any individual who is responsible for the administration, design, conduct, or reporting of sponsored research, internally funded research that involves human subjects, or proposals for such funding. This definition is not limited to those titled or budgeted as principal investigator or co-investigator on a particular proposal, and may include postdoctoral associates, senior scientists, or graduate students, as determined by the academic advisor, department chair, or Dean. This term also includes study coordinators, and may also include other individuals as determined by the Dean.
10. “Public Health Service” or “PHS” means the Public Health Service of the U.S. Department of Health and Human Services, and any components of the PHS to which the authority of the PHS may be delegated, including but not limited to the National Institutes of Health (NIH). The components of the PHS include, but are not limited to, the Administration for Children and Families, Administration on Aging, Agency for Healthcare Research and Quality, Agency for Toxic Substances and Disease Registry, Centers for Disease Control and Prevention, Federal Occupational Health, Food and Drug Administration, Health Resources and Services Administration, Indian Health Service,

National Institutes of Health, and Substance Abuse and Mental Health Services Administration.

CONFLICT OF COMMITMENT:

The University of Rochester confers upon faculty the privilege and obligation to pursue teaching, research, scholarship, and clinical care (whichever are appropriate to the position held). Fulfillment of these obligations requires a commitment of expertise, time, and energy.

Conflicts of commitment are to be avoided because they violate the principle that faculty are paid by the University to fulfill their University commitments, detract from the educational and research process and may generate disputes between faculty and the University over intellectual property ownership. A conflict of commitment exists when a faculty member's outside activities (e.g., consulting, pro bono or public service work) interfere with his or her ability to meet the research, educational, service, and administrative responsibilities of his or her faculty appointment.

Faculty responsibilities may depend on whether the appointment is full- or part-time and may vary across schools and departments, but should be agreed upon between the faculty member and department chair. Faculty must commit their professional and intellectual allegiance and energies to the University as specifically defined in the University's Policy on Faculty Consulting.

A full-time appointment confers an obligation for a faculty member to have a significant presence on campus to be accessible to students and staff, and to be available to interact with University colleagues throughout the academic year, unless the department chair and Dean both have granted specific prior approval for extended or frequent absences from campus. Even activities such as pro bono work or government service in the public interest should be managed so they do not take precedence over or conflict with a faculty member's commitment to the University.

Specific activities that require explicit prior written approval of the department chair and Dean include, but are not limited to, serving as a PI on behalf of another institution or entity; serving in a significant managerial role of an external entity, whether for-profit or not-for-profit; and assuming a board position in a for-profit company.

If a situation raising questions of conflict of commitment arises, a faculty member should discuss the situation with his or her department chair and Dean.

CONFLICT OF INTEREST:

A conflict of interest occurs when there is a divergence between an individual's private interests and his or her professional obligations to the University and its constituents. The conflict may be either actual or apparent. Apparent conflicts of interest arise in circumstances in which an independent observer might reasonably question whether the individual's professional objectivity may be affected by considerations of financial gain.

The goal of the policy is to avoid or to manage situations that call into question the credibility and objectivity of an investigator or the University's research and findings. An additional goal is to promote the best interest of students and others whose work depends on faculty direction. The University is an institution of trust; faculty must respect this principle and conduct their affairs in ways that do not compromise the integrity of the University. In addition, the University recognizes that even the perception that faculty have financial interests in the outcome of their research can call in to question the credibility and objectivity of the research.

Faculty members should conduct their affairs so as to avoid or minimize conflicts of interest, and must respond appropriately when actual or apparent conflicts of interest arise. To that end, this policy informs faculty about situations that generate conflicts of interest related to research, provides mechanisms for faculty and the University to manage those conflicts of interest that arise, and describes situations that are prohibited. Every faculty member has an obligation to become familiar with, and abide by, the provisions of this policy. If a situation raising questions of conflict of interest arises, a faculty member should discuss the situation with his or her department chair and school Dean.

1) DISCLOSURE OF FINANCIAL INTERESTS

All Faculty members with paid academic, clinical or research appointments, all paid non-faculty Investigators, and all others designated by the Dean, are required to disclose their outside financial interests to the University on an annual and an ad hoc basis, as described below. Each Dean must ensure compliance with this policy, and is responsible for 100% compliance with the disclosure process, as well as review of annual and ad hoc disclosures for their school. Schools must use either written forms or develop secure web-based disclosure systems. All disclosure form templates, whether web-based or written, must be submitted to and approved by the Provost prior to implementation. The COI Committee may request, at any time, a review of those forms and processes.

Regardless of the disclosure requirements, an individual, in his or her own best interest, is encouraged to disclose any other financial or related interest that could present an actual conflict of interest or be perceived to present a conflict of interest. Disclosure is a key factor in protecting one's reputation and career from potentially embarrassing or harmful allegations of inappropriate behavior. Faculty members are encouraged to ask for guidance from their department chair or Dean or the Provost's Office even in situations that are not covered by the disclosure procedures in this policy.

a) Annual Disclosures

All faculty, and all non-faculty Investigators, must disclose their Significant Financial Interests to the University, through their Dean or the Dean's designee, on an annual basis. All forms must be submitted to the Dean or designee by March 1 for the previous calendar year.

Other personnel involved in the management, negotiation, or control of sponsored research or technology transfer (e.g., relevant staff of ORPA and UR Ventures) also

must disclose their Significant Financial Interests to their supervisors annually, on a form or using the system adopted by the Director of ORPA or UR Ventures as applicable. These forms must be completed by March 1 and submitted to the relevant supervisor.

The Deans may require annual disclosure of all or a broader category of Financial Interests for their respective schools or units, even though such Financial Interests may not meet the definition of Significant Financial Interests.

b) Ad hoc Disclosures

In addition to annual disclosure, certain situations require ad hoc disclosure. All faculty, and all non-faculty Investigators, must disclose their Significant Financial Interests to the University, through their Dean or the Dean's designee, within 30 days of their initial appointment or employment. Chairs and division chiefs are encouraged to discuss outside financial interests with faculty candidates during the recruitment process, so any actual or potential conflicts of interest can be discussed and addressed as appropriate.

Prior to entering into University sponsored projects, University technology licensing arrangements, or procurement of materials or services where the faculty member or non-faculty Investigator has a Significant Financial Interest, the faculty member or non-faculty Investigator must affirm that their last annual disclosure is complete and accurate, or submit an ad hoc updated disclosure of his or her Significant Financial Interest with the outside entity to ORPA, and, where appropriate, to UR Ventures or Corporate Purchasing. The University will not submit a research proposal unless the Investigator(s) have submitted such ad hoc COI disclosures.

In addition, all Investigators must submit to their Dean an ad hoc disclosure of any Significant Financial Interest they acquire during the course of the year, within thirty (30) days of discovering or acquiring the Significant Financial Interest.

Deans may require ad hoc disclosure of all or a broader category of Financial Interests for their respective schools or units, even though such Financial Interests may not meet the definition of Significant Financial Interests.

c) Travel

Investigators whose research is funded through any unit of the Public Health Service must also disclose reimbursed or sponsored travel related to their institutional responsibilities, as defined above in the definition of Financial Interest. Such disclosures must include, at a minimum, the purpose of the trip, the identity of the sponsor/organizer, the destination, the duration, and, if known, the monetary value. The Dean or designee will determine if additional information is needed (e.g., the monetary value if not already disclosed) to determine whether the travel constitutes a Financial Conflict of Interest with the Investigator's PHS-funded research.

2) REVIEW AND DECISION OF THE DEAN

If the disclosure form reveals a Significant Financial Interest, it must be reviewed by the Dean or designee for a determination of whether it constitutes a Financial Conflict of Interest. If a Financial Conflict of Interest exists, the Dean must take action to eliminate, reduce or manage the conflict, as appropriate. Conflicts of interest that involve more than one school require a single management strategy agreed to by all relevant Deans.

For purposes of research, a Financial Conflict of Interest will exist when the Dean or designee determines that a Financial Interest or Significant Financial Interest could directly and significantly affect the design, conduct, or reporting of University research. Deans may also decide to manage Financial Interests or Significant Financial Interests that are not Financial Conflicts of Interest, to promote transparency and avoid the appearance of conflicts of interest.

If the Dean determines that there is a Financial Conflict of Interest that can be managed, he or she must require and approve a written management plan before any related research goes forward. The affected Investigator is responsible for developing, submitting and signing a proposed management plan, in consultation with ORPA. Before approving a management plan, the Dean should consult with the relevant department chair(s) unless it is not appropriate to do so (e.g. if the chair has an institutional conflict of interest). All conflict of interest management plans approved by the Deans must be submitted to the COI Committee for its review and approval. Investigators are entitled to expect relatively prompt action. If time is of the essence, the Dean may approve an interim management plan and update the plan as more information becomes available.

The Dean is responsible for monitoring Investigator compliance with management plans. To address complex situations, oversight committees may be established by the Dean to periodically review the ongoing activity, to monitor the conduct of the activity (including use of students and postdoctoral appointees), to ensure open and timely dissemination of the research results, and to otherwise oversee compliance with the management plan.

The Dean may consult the COI Committee for guidance in interpreting this policy, adopting school-specific policies or guidelines, or in the application of the policy to particular situations. The Dean should consult the COI Committee prior to making any decision that directly conflicts with this policy.

Deans must avoid both institutional and individual conflicts of interest personally. If a Dean has an actual or apparent conflict in either making a decision or approving a plan involving a conflict of interest, the Dean should forward the matter to the COI Committee for review, and the Provost will make the final decision.

If the Investigator believes that improper procedures have been applied or that bias or prejudice influenced the procedures in the decision of the Dean regarding a conflict of

interest, the Investigator may appeal to the Provost through the general grievance procedure, or other appropriate grievance process as described in the Faculty Handbook.

3) OTHER UNIVERSITY OFFICIALS ENCOUNTERING CONFLICTS

Senior administrators, including but not limited to the Directors of UR Ventures, Office of Research and Project Administration, and the Research Subjects Review Board, also may seek the advice of the COI Committee if they identify a potential conflict of interest in the course of exercising their University responsibilities.

4) CLINICAL TRIALS

a) Review of Financial Interests Related to Clinical Trials

Clinical trials involve particularly sensitive issues if the Investigator has a Financial Interest related to the clinical trial. Accordingly, all Financial Interests related to clinical trials that are disclosed to the Dean will be reviewed to determine whether they constitute Financial Conflicts of Interest.

b) Transparency Policy for Clinical Trials

In the interest of promoting transparency, whenever an Investigator has a Financial Interest related to a clinical trial, certain requirements will apply regardless of whether the Financial Interest constitute a Financial Conflict of Interest, as follows:

- i) The Investigator must disclose his or her Financial Interest in publications, presentations and press releases that involve the research related to the Financial Interest;
- ii) The Investigator must disclose his or her Financial Interest to the study coordinator who oversees the subject consent process, and any other individuals involved in obtaining informed consent, and any other study personnel or students involved in the study;
- iii) The subject consent form must include a disclosure approved by the RSRB; and
- iv) The Investigator must promptly notify the Dean or designee of any additional Financial Interests related to the research that he or she receives or expects to receive.

c) Management of Financial Conflicts of Interests in Clinical Trials

An Investigator who holds a Financial Conflict of Interest related to a clinical trial may not conduct such research at the University unless there are compelling reasons to do so, as determined by the Dean, or it otherwise fits within guidelines adopted by the Dean in consultation with the COI Committee. This prohibition extends to all who report (directly or indirectly) to the Investigator in question. The determination of whether or not there are compelling circumstances will be made by the Dean after reviewing the Investigator's written justification, and seeking the advice of the department chair(s) as appropriate. In the event of compelling circumstances, the

Investigator may be permitted to remain involved in the research. Whether the circumstances are deemed compelling will depend in each case upon the nature of the science, the nature of the interest, how closely the interest is related to the research, and the degree to which the interest may be affected by the research (e.g., the phase of the trial). However, when the Financial Conflict of Interest is an equity interest in a start-up company that licenses or manufactures the investigational product, participation in any manner other than a consulting role is prohibited.

In most circumstances, the management plan will ordinarily require that informed consent of human subjects participating in a clinical trial will be obtained by a clinician with no Financial Conflict of Interest related to the research. The Dean may permit a conflicted Investigator to obtain consent only when the Dean determines that no feasible alternative exists, for example, in situations where the Significant Financial Interest is de minimis and no other qualified individual would be available to explain the risks, benefits and alternatives to participating in the trial. Further, the management plan should seek to identify another principal investigator to oversee the administration of the trial, including enrollment of subjects, the subject consent process, testing of the drug or device, and analysis of results. The appointed investigator must be qualified to administer the study protocol, and must not be someone over whom the conflicted investigator has supervision. A conflicted Investigator may, with the approval of the Dean, continue his or her involvement in the clinical trial, typically in a technical advisor role. Only when there is a critical need for the conflicted Investigator to remain the principal investigator may the Dean approve such a role. A written management plan that allows for the conflicted Investigator to be the PI must include a justification for this departure from standard protocol.

The conflicted Investigator must submit his or her approved conflict management plan to the IRB at the time the protocol is submitted for review.

5) REPORTING TO FEDERAL SPONSORS

Should any Financial Conflict of Interest require reporting to a federal sponsor, ORPA will report in accordance with federal regulations.

6) INVESTIGATOR NON-COMPLIANCE

a) Disciplinary Action

In the event of a faculty member or non-faculty Investigator's failure to comply with this Policy, the Dean may suspend all relevant activities or take other disciplinary action until the matter is resolved or other action deemed appropriate by the Dean is implemented. Violation of any part of this Policy may also constitute cause for administrative action as described in the Faculty Handbook or Human Resources policies, as applicable.

A Dean's decision to impose sanctions on a faculty member or non-faculty Investigator because of failure to comply with this Policy, or failure to comply with

the decision of the Dean or Provost, will be described in a written explanation of the decision to the Investigator, department chair(s), COI Committee, and, where applicable, the Research Subjects Review Board, and will notify the individual of the right to appeal the decision in accordance with the grievance procedure as outlined in the Faculty Handbook or Human Resources policies, as applicable.

b) Retrospective Review

In addition, if the Dean determines that a Financial Conflict of Interest was not identified or managed in a timely manner, including but not limited to an Investigator's failure to disclose a Significant Financial Interest that is determined to be a Financial Conflict of Interest, or failure by an Investigator to materially comply with a management plan for a Financial Conflict of Interest, a committee appointed by the Dean will complete a retrospective review of the Investigator's activities and the research project to determine whether the research conducted during the period of non-compliance was biased in the design, conduct or reporting of the research.

Documentation of the retrospective review shall include the project number, project title, PI, name of Investigator with the Financial Conflict of Interest, name of the entity with which the Investigator has the Financial Conflict of Interest, reason(s) for the retrospective review, detailed methodology used for the retrospective review, and findings and conclusions of the review.

If the affected research is funded by the Public Health Service, ORPA will update any previously submitted report to the PHS relating to the research, specifying the actions that will be taken to manage the Financial Conflict of Interest going forward. If bias is found, the report will include a mitigation report in accordance with the PHS regulations, including a description of the impact of the bias on the research project and the plan of action to eliminate or mitigate the effect of the bias.

7) IDENTIFICATION OF NON-RESEARCH CONFLICTS OF INTEREST

The Deans may also review Financial Interests disclosed by faculty members and non-faculty Investigators to determine whether there are conflicts of interest related to Institutional Responsibilities other than research, and take appropriate action to manage such conflicts. They may also share information about disclosed Financial Interests with other senior leaders or their designees, to permit them to make such determinations and take actions as permitted or required under other University policies.

8) TRAINING

Each Investigator must complete training on this Policy, the Investigator's responsibilities regarding disclosure, and the Public Health Service regulations prior to engaging in research funded by the Public Health Service, and at least every four years thereafter. Investigators new to the University must complete the training within a reasonable period of time. Investigators must also complete training within a reasonable period of time as determined by the Provost in the event that this Policy is substantively amended in a manner that affects the requirements of Investigators, or if it

is determined that the Investigator has not complied with this policy or with a management plan related to their activities. Deans may determine that training must be required for all Investigators and/or faculty in their respective schools, not only those engaging in research funded by the Public Health Service.

9) APPROPRIATE USE OF UNIVERSITY RESOURCES, INCLUDING FACILITIES, PERSONNEL, EQUIPMENT, AND INFORMATION

Faculty may not use University resources, including facilities, personnel, equipment, confidential information, or the University's name, logo, servicemark, or trademarks, as part of their outside consulting activities or for any other non-University purposes. Faculty must report on a timely basis the creation or discovery of all potentially patentable inventions created or discovered as a result of substantial use of University resources. The following activities are prohibited:

- a) A faculty member involving those students whom he or she directly supervises or advises in a University graduate program in business activities outside of the University in which the faculty member has a Significant Financial Interest and/or officer or director role, unless approved by the Dean. Before approval, the Dean should seek advice from the relevant department chair(s). If the Dean approves such involvement, the faculty advisor, student, and Dean must agree in writing to a conflict management plan. The plan must include, at a minimum: i) ongoing oversight by a faculty committee (e.g., the thesis committee), ii) a guarantee that financial support will not decline before completion of the degree requirements as long as the committee judges the student's progress to be acceptable, and iii) a guarantee that a suitable advisor will be appointed to replace the conflicted advisor if necessary;
- b) Assigning the faculty member's students, staff or postdoctoral appointees tasks within the University for purposes of potential or real financial gain of the faculty member rather than the advancement of the scholarly field or the students' educational needs;
- c) Granting access to University resources or services for purposes outside the University's missions, or offering inappropriate favors to outside entities in an attempt to unduly influence them in their dealings with the University;
- d) Using for personal gain, or granting unauthorized access by others to, University confidential information; and
- e) Claiming ownership or assigning ownership to any third party of an invention resulting from research involving the use of University resources that are not generally available to the University community. Examples of University resources that are considered to be generally available include, but are not limited to, standard computers, widely-used software, telephones, and the library. A faculty member who is uncertain about the application of this section should discuss his or her situation with the Dean. Ownership of computer software and

copyrightable material may require special consideration. (Refer to the University policy on Intellectual Property and Technology Transfer.)

10) RECORD RETENTION

The Deans will retain all disclosure forms, conflict management plans, and related documents and electronic records for a period of five years after the completion of the relevant research or five years after the conflict has ended, whichever is longer.

11) CONFIDENTIALITY

To the extent permitted by law, all disclosure forms, conflict management plans, and related information will be confidential. However, the University may make such information available to an agency funding research of the faculty member or non-faculty Investigator to a requestor of information concerning financial conflict of interest related to PHS funding or to an affiliated research consortia, if requested or required. The University may also make such information available if it is in the best interests of the Investigator and/or the University. If the University is requested to provide disclosure forms, conflict management plans, and related information to an outside entity, the investigator will be informed of this disclosure.

12) RELATED POLICIES

The following University of Rochester policies relate to this policy:

- [Policy on Intellectual Property and Technology Transfer](#)
- [Policy on Institutional Conflict of Interest in Research Activities](#)
- [SMD Policy on Consulting and Outside Activities](#)
- [Faculty Guidance on Consulting](#)
- [URMC Industry Interactions Policy](#)
- [Guidelines on Research Integrity and Conflict of Interest: Graduate Students and Postdoctoral Appointees](#)
- [Conflict of Interest \(Business Transactions\)](#)
- [Purchasing Services Guidelines on Conflict of Interest](#)

Policy History:

- 8/02 Adopted by the Conflict of Interest Committee
- 12/03 Amendment to Prologue recommended by Research Policy Committee
- 1/04 Prologue amended by Conflict of Interest Committee
- 1/08 Amended by Conflict of Interest Committee
- 6/12 Amended by the Conflict of Interest Committee, effective August 24, 2012
- 1/13 Corrections noted by COI Committee; reposted as corrected 2/13
- 12/15 Amended to update name of technology transfer office