

Illustrative Issues Addressed in Conflict of Interest Management Plans

- Future disclosure to the institution
- Disclosure to third parties
- Scope of permissible activities
- Who must approve such activities?
- Acknowledgement of compliance with law, regulation and institutional policy
- Communication with government regulators
- Definition of key terms
- If an oversight committee will be used, specification of its:
  - Membership
  - Functions
  - How often will reports be made to it?
  - Content of reports
  - By whom?
  - How often will the committee meet?
  - To whom will it report?
  - What will be the scope of its authority (e.g., decide, recommend)
  - Will it be advised by counsel?
  - Who is responsible for ensuring the oversight committee receives complete, accurate and timely information?
- Assignment of students and trainees to research
- Conditions for sale or transfer of equity
- Use of institutional name in commercial activity
- Use of institutional facilities and resources for consulting activities
- Participation in institutional decisions on transactions with outside entity in which individual has a financial interest
- Term of the plan
- Conditions under which it may be amended