CONFLICT OF INTEREST (COI) MANAGEMENT PLAN

Investigator’s Name:

Entity with which the Investigator Has a Relationship:

Effective Period of this Management Plan (one year):

When is a Conflict Of Interest (COI) Management Plan Required? A COI Management Plan must be in place before NAU will accept any research support for a project in which a financial or management conflict has been identified.

Background: Information about the relationship between the NAU Investigator and the Entity:

- Describe the Entity and the relationship of the employee to the Entity.
- Is the disclosure due to involvement in the formation of a start-up Entity?
  - Who are the founders of the company?
  - What is the intellectual property on which the Entity is based?
- Describe the anticipated relationship of the Entity to the university.
- Describe the employee’s time commitment to the Entity.
- Describe any potential relationship of graduate students to the Entity.
- Discuss the potential use of NAU equipment and/or facilities by the Entity.

1. Involvement and Interaction of Other University Personnel

The Investigator is responsible for ensuring that all research workers, including students, fellows, trainees, and visiting scientists, engaged in research under the Investigator’s supervision (Researchers) are notified of the relationship with the Entity, the existence of this management plan, and the names of contacts, as provided below, for the Researchers to notify with any concerns. The information should include explanations of:

  a) The Investigator’s relationship with the Entity, and
  b) The right of students and staff to bring concerns about the effect of the Investigator’s relationship with the entity on their work, studies, or progress towards degree to the Dean, his/her designee or the COI Committee.

The process for providing information should meet the following criteria:

- Includes a written summary of the information for each Researcher
- Provides documentation that this process has occurred to the COI Committee within 45 days of receipt of this management plan
- Provides any individuals who subsequently join the group comparable information in a timely manner
- Updates documentation to the COI Committee at least once a year
- A sample of the written communication is attached

The Investigator’s relationship with the Entity may not place restrictions on the scholarly and research activity of any Researcher, including the ability to receive,
analyze, or interpret data and to publish on the research and scholarly activity. The highest level of protection must be sought for the student Researcher and participation in such research activity cannot prevent or inhibit the student Researcher for meeting applicable degree requirements. Such involvement may require modification of this COI Management Plan to appropriately manage student Researcher activity.

All of the university’s activity with the Entity must be conducted under formal written agreements, such as sponsored research agreements.

The Entity shall not direct the use of university resources. Examples include: university-owned equipment in the Investigator’s laboratory and graduate students and other personnel paid on grants from the Entity to the University.

The Investigator must direct any Researcher with significant financial interests in the Entity to make an annual disclosure of outside activities in accordance with NAU’s COISP Policy, if they have not already done so.

The Investigator will notify the COI Management Committee of any and all changes in his/her relationship with the Entity (e.g., the name of the Entity changes or the Investigator becomes a Board Member).

2. Research
An appropriate COI Management Plan must be in place before the university will accept any research support for a project in which a financial or management conflict has been identified.

You may not be directly involved in making decisions involving financial transactions with the Entity using funds under your control. Any such financial transactions are to be delegated to an impartial party, who is not under your supervision or control, such as your Dean/Center Director.

Intellectual Property: Any intellectual property developed by the Investigator, any Researcher or any employee of the Entity must be disclosed to the Office of NAU Innovations. Ownership of such intellectual property shall be determined in accordance with ABOR and NAU technology transfer policies.

3. Personnel Commitments
All University work commitments must be met and the Investigator must discuss and receive permission for plans to use regular working hours to work for the Entity.

4. Publications and Presentations
Although publications may be briefly delayed for the purpose of pre-publication review and intellectual property protection, the relationship with the Entity may not restrict publications or presentations.
The Investigator and all Researchers must disclose the relationship with the Entity in publications and academic presentations where disclosure is possible and appropriate. See Examples.

5. University Facilities and Services
Use of university facilities or services by the Entity must be in accordance with all relevant university policies pertaining to use by external parties. Arrangements for use of university facilities or services must be made through the Department Head and Dean/Center Director and in most circumstances will require written agreement. This includes use of computers, laboratory equipment and supplies that reside in the Investigator’s university laboratory.

6. COI Management Committee Review Procedures
The COI Management Committee will establish a case file for each COI Management Plan and will monitor compliance with the COI Management Plan. To that end, the Investigator must meet at least once per year (an Annual Meeting) with the COI Management Committee to review information related to the Investigator’s relationship with the Entity, its influence on the Investigator’s university activities, and compliance with the terms of the COI Management Plan. Prior to the Annual Meeting, the Investigator will submit an annual report to the COI Management Committee addressing these issues.

7. Other
Please use this section to address any other concerns or unusual circumstances that require oversight.

Approved by the Chair of the COI Management Committee:

_____________________________________________  _________________________
Name:                                                                 Date:

_____________________________________________  _________________________
Name:                                                                 Date: