

COI Committee Responsibilities

COI Administrators

The COI Administrators provide administrative and tactical support to the COI function and the COI in the following ways:

- Coordinate reporting, collection, review, resolution, and communication regarding reports of external commitments and financial interests;
- Conduct an initial screening of disclosures to ensure completeness and obtain additional information or clarification from the reporter or other individuals, as needed and determine whether they are exempt from review, eligible for expedited review, or require full Committee review;
- In cases of appeal, coordinate the process of submission, review and resolution. ● Serve as subject matter experts and advise reporters and members of the COI on related policies, regulations, guidelines and best practices;
- Serve as the primary liaison between the Committee and reporters, and facilitate discussions between reporters, the COI and others;
- Report to external agencies when required;
 - Train and provide continuing education to COI members and the general research population in the identification and management of financial conflicts of interest, including related university policies and procedures and federal requirements;
- Draft operating principles, procedural and guidance documents, and template management plans for review and approval by the COI;
- As required, or when requested by the COI, research and provide input on alternative approaches to Conflict Management;
- Stay current on developments in the regulatory environment, assess their applicability to University of Maryland, and advise the COI on impacts;
- In accordance with required regulations and best practices, work with the COI and the VPR to implement required or recommended changes to the reporting and management of disclosures.

COI Committee Members

- Assist and advise reporters on University of Maryland policy considerations and regulatory requirements;
- Review disclosures submitted for a full COI review carefully, viewing all notations, checkboxes, and entity information (if provided) and provide comments noting acknowledgment and any concerns.
- Add comments to sections requiring additional information. Comments here should indicate whether you concur or not with the answer the Reporter provided. Examples of comments:
 - I have read and am ready to discuss
 - I would like the committee to discuss at the next meeting
 - I believe this disclosure requires a management plan
 - I do not concur with the provided information because...

- I do not believe this COI can be managed due to...
- All disclosures included on monthly agenda must be reviewed and acknowledged prior to the meeting to support an informed discussion
- The COI Committee typically meets the 2nd Wednesday of month. The disclosure must be completed, electronically routed, and approved in KCOI by the first of the month for submission to that month's agenda.
- All COI Committee Members are expected to attend 75% of meetings held annually. If a committee member cannot attend a meeting they are expected to notify COI staff. If the Committee Member will be absent for an extended period then the member should inform the COI Office in writing so that an appropriate replacement can be found.
- COI Committee Members are expected to sign a confidentiality statement. New members are requested to attend an initial meeting in person to become orientated to the Committee process.

Recommendation of the COI Committee

The COI Committee shall review the disclosure form and accompanying documents and recommend to the President whether the University should approve the disclosed Relationship. The COI Committee may not recommend approval of any Relationship that would:

- give improper advantage to the outside entity with whom the Employee has a Relationship;
- lead to misuse of University students or Employees for the benefit of such outside entities;
- otherwise interfere with the University duties and responsibilities of the Employee maintaining a Relationship with the outside entity;
- be so influential as to impair impartiality in conducting research, interpreting research results, or determining research or other professional and employment priorities;
- present an unmanageable or otherwise unacceptable conflict of interest or the appearance of an unmanageable or otherwise unacceptable conflict of interest; or
- otherwise violate state or federal laws, regulations, policies, or procedures, or create a situation that is not in the best interest of the University.

A recommendation for approval indicates the COI Committee's conclusion that any conflict or potential conflict is manageable, in accordance with these procedures and any approved management plan. A decision not to recommend approval indicates the Committee's conclusion that a conflict of interest exists that cannot be properly managed, and that the Employee should refrain from participating in the activity or Relationship. The COI Committee's recommendations shall be forwarded through the Vice President for Research to the President.