

## **Conflict of Interest Disclosure Process**

**1.** If the Department Chair, unit head, or faculty member believes that there is a conflict of interest (COI) or a potential conflict of interest, the faculty member or party with the conflict will complete the Conflict of Interest Disclosure Form, and submit it to the Department Chair or unit head. The form is available here:

<http://www.umresearch.umd.edu/RCO/New/ConflictofInterest.html>

**2.** The Department Chair or unit head will review the information provided on the disclosure form, ensure that it is complete, and indicate his/her conclusion on page one of the form as to whether or not a real or potential conflict of interest exists; and if so, whether the management plan described will permit the conflict to be managed in accordance with University policies and procedures. The Department Chair or unit head will then sign the disclosure form and forward it to the Dean.

**3.** The Dean will review the information provided on the disclosure form, indicate concurrence or non-concurrence with the conclusions of the Chair or unit head, and forward the disclosure form to the COI Administrator in the Research Compliance Office.

**4.** The COI Administrator will review the disclosure form, and if there is not a conflict that must be reviewed by the Conflict of Interest Committee (COIC), so notify the Department Chair, the Dean, the Chair of the COIC, and the Assistant Vice President for Research. If there is a conflict or potential conflict that must be reviewed by the COIC, the COI Administrator will assign the disclosure form and any related materials to the COIC members for consideration at the next available COI Meeting.

**5.** The COIC will review the disclosure form and any related materials. If the COIC concludes that there is not a conflict under the circumstances described, the COI Administrator will so notify the discloser, the Chair, and the Dean. If the COIC decides that there is a conflict that cannot be managed, the COI Administrator will notify the discloser, the Chair, and the Dean that the COIC will not recommend approval of an exemption. If the COIC decides that there is a conflict but that it can be managed, a recommendation for approval of an exemption will be prepared by the COI Administrator and forwarded to the President's Office via the Vice President and Chief Research Officer's Office. Approval (or non-approval) of an exemption by the President will be reported by the COI Administrator to the discloser, the dean, and the Chair, with a description of any conditions that have been imposed.

**6.** Where the President has approved an exemption, an updated disclosure form will be required annually.