

Conflict of Interest Committee

Policy

The Conflict of Interest Committee shall be responsible to review all documentation provided by employees, and to document and manage all Conflict of Interest activity.

Purpose

The Conflict of Interest Committee is responsible to the University President's Cabinet. Its purpose is to review and manage Conflict of Interest issues as defined specific to/for research and grant activities and units.

Membership

The committee membership includes Vice President for Academic Affairs, Vice President for Business Affairs, and Director of the Grants Office.

Responsibilities

Responsibilities include but are not limited to:

- a) Reviewing documented, reported and/or disclosed Conflict of Interest,
- b) Assess risk and render decisions where conflict may exist,
- c) Manage documented Conflict of Interest,
- d) Maintain support documentation

Supporting Documentation

Conflict of Interest Disclosure Form 1
Conflict of Interest Disclosure Supplement Form 2

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Procedures

Employees are required disclose anything that could reasonably be interpreted as creating a Conflict of Interest. In regard to Research and Grant Activity, employees are required to complete a Conflict of Interest Disclosure. Employees may have numerous interests, only some of which could result in a Conflict of Interest, whereas the Conflict of Interest Committee acts to determine if a conflict exists and if so, how to manage it.

1. Employees complete Conflict of Interest Disclosure form and submit it to the Grants Office.
2. Grants Office convenes Committee.
3. Committee Reviews documentation provided.
4. When no Conflict of Interest exists, no further review is required.
5. When a Conflict of Interest may exist, the Conflict of Interest Committee will draft a summary of what led to that conclusion, and suggested terms for a Memorandum of Understanding for managing the conflict will be forward to the MSU Cabinet to review. Legal may be consulted in such cases.
6. When a Conflict of Interest exists, but the risk to the University can be managed, in consultation with the Employee, a Memorandum of Understanding will be signed by the University and Employee that details the manner in which the Conflict of Interest will be managed.
7. When a Conflict of Interest exists and that the risk to the University cannot be managed, the Appropriate Vice President or his/her designee, in consultation with the Employee will produce a Memorandum of Understanding to be signed by the University and Employee that details the manner in which the Conflict of Interest will be eliminated.
8. All completed and signed Code of Conduct/Conflict of Interest Statement documentation is maintained in the Employees Permanent Personnel file.

Any employee with information pertaining to a potential Conflict of Interest or Code of Conduct violation may report, in writing, to the appropriate vice president for the employee. If the person does not know the identity of the Appropriate Vice President, then the information may be delivered to any Vice President, who will determine the identity of and deliver the information to the Appropriate Vice President.

A Report of Potential Conflict may also be submitted via any system operated by the University or the State of North Dakota for whistle blowers.

Reference Documents

NDUS 611.4 Employee Responsibility and Activities: Conflict of Interest
M611.4 Conflict of Interest

NDUS 611.5 Employee Responsibility and Activities: Outside Employ, or Consulting Practices; Use of Institution Property

M611.5 Consulting and Honoraria

NDUS 611.6 Employee Responsibility and Activities: Confidential Proprietary Information

NDUS 611.8 Employee Responsibility and Activities: Research of Human Subjects

National Institute of Health: NIH–<http://grants.nih.gov/grants/policy/coi>

National Science Foundation: NSF–http://www.nsf.gov/pubs/manuals/gpm05_131/gpm5.jsp#510

US Department of Health and Human Services Office of Research Integrity (ORI): <http://ori.hhs.gov/ori-introduction-responsible-conduct-research>

Adopted: August, 2015

Sponsors: President, Vice President for Academic Affairs and Vice President for Business Affairs,
Director of Grants Office