**COVER SHEET/Instructions**

**General Information**

This document provides a template for preparing a Conflict of Interest Management Plan (COIMP) when a Conflict of Interest (COI) has been identified that requires management under the terms of the University’s Policy on Conflict of Interest and Commitment, ASU Policy Manual 604.6 (“Policy 604.6”). *This COIMP template is to be used when member(s) of the project team has a conflict with a financial value of under $5,000. If the conflict involves family members on the project, use template designed for family members.*

## Management Plan Elements

The items set forth in Section II, “Management Plan Elements,” are drawn from Policy 604.6, Section 4.8.5. Examples of text that could be relevant in a particular situation appear below. If the item is not applicable in a given situation, simply check the statement to that effect so that it will be clear the item has been considered. Note that for externally funded research, provisions addressing certain of these items may be the subject of negation between the Office of Research and the FUNDER and incorporated in the research agreement.

## PUBLIC DISCLOSURE OF FINANCIAL INTERESTS

*Examples* could include, but are not limited to:

* + Disclosure in IRB documentation provided to human subjects.
	+ Annotations to publications submitted to journals.
	+ Other measures as appropriate.

## MONITORING OF RESEARCH OR OTHER ACTIVITY BY NEUTRAL, INDEPENDENT REVIEWER(S)

*Examples* could include, but are not limited to:

* + Monitoring by a colleague (within the department or in another department or unit on campus) with appropriate expertise.
	+ Monitoring by an impartial external third party.
	+ Monitoring by a small ad hoc committee formed specifically for this purpose.
	+ Other measures as appropriate.

## MODIFICATION OF RESEARCH PLAN OR WORK PLAN

*Examples* could include, but are not limited to:

* + Requiring that random samples of biomaterials be sent to an alternative lab to support findings.
	+ Requiring supplements to be purchased from a non-conflicted vendor.
	+ Mandating a change in procedures or statistical analysis.
	+ Assigning an objective third party to manage or review finances on a regular schedule.
	+ Other measures as appropriate.

## DISQUALIFICATION OF COVERED PERSON FROM PARTICIPATION IN PROJECT OR ACTIVITY, OR PARTS THEREOF

May be relevant especially for small business technology development and small business innovation awards, where Principal Investigators are both the campus PI and the owner of a spinoff company.

*Examples* could include, but are not limited to:

* + Conflicted individual is disqualified as serving as the campus PI and a campus collaborator appointed to that role.
	+ PI divests her- or himself of the administrative role in the external business.
	+ Other measures as appropriate.
	+ Add a supervisor section for students and employees.

**If you need assistance please contact the Office of Research Protections at 828.262.2692.**

**This cover sheet can be removed from the completed Management Plan.**

**CONFLICT OF INTEREST MANAGEMENT PLAN (COIMP) Simple Plan**

Pursuant to Appalachian State University’s Conflict of Interest and Commitment Policy (ASU Policy Manual 604.6), an actual or a potential Conflict of Interest (COI) has been identified that must be mitigated through a Conflict of Interest Management Plan (COIMP). This document, developed in accordance with Policy 604.6, Section 4.8, sets forth the steps agreed upon by the signatories below in order to manage the conflict(s). In particular, **the Covered Person(s) agree(s) to cooperate with officials of ASU in managing actual or potential COIs identified in this document.**

**SECTION I: GENERAL INFORMATION**

## Name of covered person(s) (the person(s) with the conflict):

## Sponsor/entity or individual with whom COI exists:

## If the conflict involves one or more *externally* funded projects, please list project information.

|  |  |  |  |
| --- | --- | --- | --- |
| AIR Disclosure# | AGrants Project # | Project Name  | **Award #** |
|  |  |  |  |
|  |  |  |  |
|  |  |  |  |

1. **If project is *internally* funded, list title of project, source of funding and dates of the project.**

## Principal investigator(s)

## Project director(s) if applicable

1. **Nature of conflict of interest (check all that apply):**

 Equity interest

 Relationship (e.g., colleague, family member, etc.)

 Consulting fee

 Travel reimbursement

 Honorarium

 Other (please describe):

## Value of financial interest (check one):

\_\_\_Not applicable to this project/disclosure.

\_\_\_$0-$1,500

\_\_\_$1,500-$3,000

\_\_\_$3,000-$4,999

\_\_\_ The value of this financial interest cannot be readily determined through reasonable measures of fair market value.

## Relationship of financial interest to the funded projects(s) and basis for determination that COI exists:

## Role and principal duties of Covered Person (with the conflict) in the project:

**SECTION II: MANAGEMENT PLAN ELEMENTS**

**The following items indicate elements that may be appropriate for the COIMP. For each item, indicate specific steps to be taken, if the item applies; or indicate that the item does not apply.**

## Public disclosure of financial interests.

\_\_\_\_ Not applicable to this COIMP

\_\_\_\_ Describe Requirements:

1. **Monitoring of research or other activity by neutral, independent reviewer(s).**

 \_\_\_\_ Not applicable to this COIMP

 \_\_\_\_ Describe Requirements:

## Modification of Research Plan or Work Plan.

##  \_\_\_\_ Not applicable to this COIMP

##  \_\_\_\_ Describe Requirements:

1. **Will students be involved in the project?**

\_\_ Yes \_\_ No

1. **Are other university employees involved in the project?**

\_\_ Yes \_\_ No

**Note:** **All personnel directly involved in the conduct of this project must be made aware of the associated potential or actual conflicts of interest and the manner in which they will be managed. Appalachian has a letter template on our COI Forms webpage for disclosing to research staff, and one for disclosing to students.**

1. **Other (If applicable, insert any other conditions necessary to manage the conflicts identified in connection with this project):**

**SECTION III: REQUIREMENTS APPLICABLE TO ALL MANAGEMENT PLANS**

1. **Policy Compliance, Including Human/Animal Subjects Protections**

Applies Does not apply

|  |  |  |
| --- | --- | --- |
|  |  | Review of Research Involving Human Subjects (ASU Policy 209) |
|  |  | Payments to Human Subjects (ASU Policy 210) |
|  |  | Human Subject Research Recruitment (ASU Policy 216) |
|  |  | Care and Use of Animals for Research Teaching or Demonstration (ASU Policy 213) |
|  |   | Use of Recombinant DNA in Research and Teaching Laboratories (ASU Policy 212) |
|  |   | Export Control Management Plan (ASU Policy 208) |

Please initial the following:

## Legal and Regulatory Compliance

\_\_\_\_\_\_ All research activity must comply with all applicable laws and regulations, including but not limited to those governing research funded by the Public Health Service.

## Intellectual Property

\_\_\_\_\_\_ Inventorship and ownership of any new intellectual property arising from the project(s) described in this COIMP will be determined in accordance with the University’s Policy on Intellectual Property Transfer (ASU Policy 207), subject to third party rights; or per the research agreement between ASU and SPONSOR (on record at the Office of Research and Sponsored Programs and AGrants)*.* Financial arrangements related to new inventions or discoveries will be negotiated at fair market value.

## Personnel

\_\_\_\_\_\_ Personnel directly involved in the conduct of the project will be made aware of the associated potential or actual conflicts of interest and the manner in which they will be managed. With respect to the project(s) and COIs identified in this document, personnel who have concerns or questions related to possible COIs may speak with \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_, who is not affiliated with the project(s) and can provide objective guidance.

## Use of University Resources

## \_\_\_\_\_\_ No University facilities, equipment, or staff will be utilized for the direct benefit of the SPONSOR unless such work is covered by a Research Agreement or other appropriate agreement. All uses of University resources by or on behalf of SPONSOR will be appropriately reimbursed (as summarized in the previously listed agreements). Should ASU facilities, equipment, or staff be used, ASU must be compensated fully for direct and indirect expenses incurred by ASU in support of these projects. Use of ASU resources in such projects must be well documented and charged to the SPONSOR.

## Reporting and Review of Conflict of Interest Management

\_\_\_\_\_\_ COVERED PERSON(S) will prepare a report updating (no longer than annually) all information relevant to this management plan, which will be reviewed and approved by \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ and forwarded to the dean of the \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ for administrative review and approval on at least an annual basis. Additional projects submitted to SPONSOR(S) will be attached and subject to this management plan prior to submission to SPONSOR(S) or managed separately under a new plan approved prior to proposal submission.

**SECTION IV: MANAGEMENT PLAN SIGNATURES**

Please add rows as needed. The covered person (the one with the conflict) should be listed and sign. Personnel who have a named role in this plan should be listed and sign. The covered person’s supervisor/Chair and Dean should also be listed and sign. After all signatures are obtained, please route to the Office of Research for COI Coordinator signature.

|  |  |  |  |
| --- | --- | --- | --- |
| Role | Name/Title (Print) | Signature | **Date** |
|   |  |   |   |
|   |   |   |   |
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**Institutional Conflict of Interest Management Plan Approval:**

\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

COI Coordinator (or Designee) Date

\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

Date of Next Review