University of Pittsburgh | Conflict of Interest
Office of Research Protections

Conflict Management Plan

Covered University Official	
Entity	
Supervisor	
Secondary Supervisor	
Senior Decision Maker	
Independent Liaison	
Data Steward	
Conflict Management Plan Identifier	

My significant financial interests and external activities in the above entity, my role and responsibilities as department chair and my participation in research that is related to my financial interests have been reviewed, and, in accordance with applicable regulations and University policies, determined to create individual and institutional conflicts of interest that are permissible, subject to the below conflict management plan.

The following conditions apply to my role and responsibilities as a Covered University Official and to my participation in all research listed in Attachment A:

	Condition	Details
1.	**Supervisor Approval and MyDisclosures**	I will obtain approval from my supervisor and update my Annual Disclosure Certification in MyDisclosures when I anticipate changes to my relationship with the company. This includes, but is not limited to, when I intend to initiate new roles or responsibilities at the company, when the funding sources for the research listed in Attachment A change or when I propose to participate in additional research that is related to this entity. Such changes may require approval of the Conflict of Interest Committee or the Institutional Conflict of Interest Committee.
2.	**Policy Compliance Statement**	I signed and will adhere to the requirements of a Policy Compliance Statement.
3.	**Disclosure to Public**	I will disclose my financial interests in all abstracts, publications, presentations, and press releases associated with the research listed in Attachment A.
4.	**Disclosure to Funding and Regulatory Agencies**	I will disclose my financial interests in applications or proposals to fund research when required by the funding agency or other funding source. I will disclose my financial interests to regulatory agencies (e.g., the Food and Drug Administration) when required.
5.	**Oversight of Internal University Funds**	I will email the Conflict of Interest Division at coi@pitt.edu to request prospective Institutional Conflict of Interest Committee review and approval of proposals to use internal University funds to support research that is related to the company. This includes, but is not limited to, research that will test or evaluate technology in which the company has a financial interest.
6.	**Influence and Supervision**	I will not use my Covered University Official role to influence relationships between the company and University employees or affiliates. This includes, but is not limited to, efforts by the company to initiate or maintain consulting, officer or manager relationships with these individuals. If I supervise a University employee who proposes to initiate a relationship with the company, a secondary supervisor must be identified to assist with the review and approval of that relationship. I will contact the Conflict of Interest Division at coi@pitt.edu to request assistance with identifying an appropriate secondary supervisor.
7.	**Disclosure to Individuals Who are Involved in Research**	The Conflict of Interest Division will contact the Principal Investigators of the research listed in Attachment A to request a list of the names and email addresses of individuals employed by or affiliated with the University and who are involved in the research. The Conflict of Interest Division will email these individuals to notify them of my conflict of interest and to provide contact information should they have concerns.
8.	**Student Engagement**	Before engaging any students in the research listed in Attachment A, I will seek approval of their non-conflicted department chair or equivalent supervisor.

SAMPLE

9.	**Interpretation of Study Results**	Consistent with professional standards, I will not be the sole faculty investigator interpreting study results. I may be part of a team that evaluates study results, provided the team includes at least one non-conflicted faculty investigator.
10.	**Independent Liaisons for Individuals Who are Involved in Research**	[Name] will serve as an independent liaison for the individuals who are employed by or affiliated with my department and who are involved in the research listed in Attachment A. As an independent liaison, [Name] will be available to these individuals should they have conflict of interest-related concerns and will share these concerns with the University Conflict of Interest Division.
11.	**Disclosure to University Faculty in Department**	I will provide the Conflict of Interest Division with a list of the names and email addresses of faculty who are employed by or affiliated with my department. I will send this list to coi@pitt.edu within five business days of the execution of this conflict management plan. I will update this list on an annual basis. The Conflict of Interest Division will email these faculty members to notify them of my conflict of interest and to provide contact information should they have concerns.
12.	**Disclosure to Human Subjects**	For all human research listed in Attachment A that requires consent, as determined by the Institutional Review Board, I will ensure my financial interests are disclosed in informed consent forms or scripts. The following language will be used: One or more of the study team members conducting this research and the University of Pittsburgh have financial interests in the company. This means it is possible that results of this study could lead to personal profit for the individual study team member(s) and to institutional profit for the University of Pittsburgh. Any questions you might have about this will be answered fully by the University of Pittsburgh Conflict of Interest Division at 412-383-0901 or coi@pitt.edu [or by the Principal Investigator, [Name], at [Telephone Number], who has no financial conflict of interest with this research.]
13.	**Re-review**	I understand that any concerns raised regarding my relationship with the company may result in re-review of this conflict management plan by the Conflict of Interest Committee, Institutional Conflict of Interest Committee, or Senior Decisions Maker.
14.	**Principal Investigator Prohibition**	I will not serve as Principal Investigator on the human subject protocol. Additionally, I will not serve as the Principal Investigator on an agreement, contract, or award from the company that will provide funding or other support for this protocol. I may serve as a co-investigator on such protocol. I may serve as a co-investigator on an agreement, contract, or award from the company that will provide funding or other support for such protocol.
15.	**Recruitment Prohibition**	I will not be involved in the recruitment of human research subjects.
16.	**Study Consent Prohibition**	I will not be involved in the human subject research consent process, and I will not obtain informed consent from subjects.
17.	**Recording of Human Research Subject Data Prohibition**	I will not engage in the recording of research data from human subjects.
18.	**Clinical Assessments and Intervention Outcomes Prohibition**	I will not be involved in clinical assessments of study eligibility criteria or intervention outcomes.
19.	**Data and Safety Monitoring Prohibition**	I will not directly participate in data and safety monitoring activities for human subject studies, including decisions about adverse event reporting. I may participate in the open portion of data safety and monitoring board or other equivalent meetings, provided I disclose my significant financial interests at the beginning of each meeting and this information is acknowledged in the meeting agendas and minutes.

Attachment A: Research

This conflict management plan is applicable to the below research.

Human Research	
PittPRO Protocol Number	**Title**: **Funding Source**: **Funding Source Award:** **Protocol Principal Investigator**: **Funding Source Principal Investigator**:

Attachment B: Signature Page

Covered University Official
I will adhere to all applicable University policies, including those that address conflicts of interest and intellectual property, and to the above conflict management plan.

[CUO]	[Date]

cc:
Supervisor
Principal Investigator
Senior Decision Maker
Data Steward
Independent Liaison