Ad Hoc Conflict of Interest Committee Report

Committee Members
» Walt Eversman, Rakesh Gudavarthy, K. Krishnamurthy (Chair), Don Madison, Don Myers, Randy Stoll, Keith Strassner

Charge
» Develop the short-term process by which to provide an appropriate review of COI disclosures that are submitted.
» Develop the short-term process to oversee activities when COI detected.
» Develop the campus COI policy, including the structure of a standing COI Committee.

Conflict of Interest Policy in the Collected Rules and Regulations

SECTION 330.015 of the Collected Rules and Regulations of the University of Missouri requires that a University employee shall make a full disclosure in writing of her or his present or proposed outside financial interest to the appropriate University official for filing in a registry located for public scrutiny in the following circumstances …

Conflict of Interest Structure

Missouri S&T Conflict of Interest Officer
» The Chancellor or designee will appoint a Conflict of Interest (COI) Officer to oversee issues related to COI.
» The person will report directly to the Chancellor and will have the authority to terminate activities that are not in compliance.

Reference: Guide to Managing Converging Interests, University of Missouri, Feb. 2004

Conflict of Interest Committee (COIC)

The COIC will consist of five members as follows:
» Chair - senior level administrator - appointed by Chancellor or designee [Chair will also serve as the Missouri S&T COI Officer]
  - 3-year term
» 3 Tenured Faculty Members appointed by Faculty Senate
  - 3-year term (two appointments initially will be for a 2-year term to stagger new appointments)
» 1 Division of Administrative Services Representative - appointed by Chancellor or designee
  - 3-year term

Non-Voting Ex-Officio Members
» UM General Counsel Office Representative
» IRB Member - selected by IRB
» TT Office Director – appointed by Chancellor or designee
» Sponsored Programs Compliance Officer - appointed by Chancellor or designee
» Administrative Assistant - COIC Liaison - appointed by Chancellor or designee
» Development Officer - appointed by Chancellor or designee

Conflict of Interest Oversight Committee

COI Oversight Committee
» The COIC will have delegated authority from the Chancellor to form an ad hoc Oversight Committee as needed to oversee conflicts arising during University’s business and academic activities.
» The committee will consist of five members as follows:
  – Missouri S&T COI Officer, Chair
  – 2 Tenured Faculty Members who are knowledgeable about the technical area
  – 2 Administration Representatives

Non-Voting Ex-Officio
» Administrative Assistant - COIC Liaison

Conflict of Interest Committee Responsibilities

Responsibilities
» identification, disclosure, management or elimination of conflicts of interest and conflicts of commitment;
» developing a conflict of interest education plan; and
» revising the conflict of interest procedures and practices consistent with UM Conflict of Interest Policies.

Conflict of Interest Dispute Resolution

Dispute Resolution
» In the event of a dispute:
  1. within 30 days, the employee submits a written appeal to the COIC and may request a meeting with the COIC; and
  2. the COIC will review the written appeal and may call a meeting with the appellant before making a final decision.
Conflict of Interest Flow Chart

1. DF signed by employee and approved by division
   - DF Reviewed by COI Officer for completeness
   - Is Disclosure Complete?
     - Yes
     - Send copy of DF to official having contracting authority (DGIP/Business Services)
     - Post to Public Registry
     - Forward comments received
     - Submit to COI committee for review

2. Is there a conflict?
   - Yes
   - Send letter to employee with copies to division and official having contracting authority
   - Is conflict manageable?
     - Yes
     - COIC Forms an OC
     - Does conflict need oversight?
       - Yes
       - Send letter to employee permitting activity with copies to division and official having contracting authority
     - No
     - Step
   - No
   - Step

COIC = Conflict of Interest Committee
DF = Disclosure Form
OC = Oversight Committee
A motion to approve the Conflict of Interest report was passed unanimously by the Faculty Senate on June 19, 2008 and closed.