Conflict of Interest/Commitment Management and Oversight Plan for

**Professor XYZ’s Activity with and Financial Interest in COMPANY**

**Background:**

The purpose of this document is to present a plan to address the conflict of interest and commitment issues that may arise in connection with Professor XYZ’s involvement with COMPANY.

The company was founded DATE, by [founders]. It is located at ADDRESS. The company aims to develop [fill in its aims].

Professor XYZ’s role with COMPANY is [describe]. Professor XYZ’s role at the University is [describe]. [Discuss actual or potential overlap of roles].

Nothing in this plan negates Professor XYZ’s responsibilities under the University’s *Policy on Conflicts of Commitment and Interest,* *Policy on Financial Conflicts of Interest in Research*, or the *Policy on Organizational Conflicts of Interest*, <https://www.vpaa.uillinois.edu/rnua/coci_policy>.

# Management of Faculty Conflict of Commitment

Pursuant to University policy, Professor XYZ will annually request time to spend on their activities with COMPANY using the Report of Non-University Activities (RNUA)*.*

Professor XYZ expects to spend no more than one day per week on the activity with COMPANY.

# Managing Conflicts of Interest Concerning Involvement of Other University Personnel

At this time, there are no plans to involve additional University personnel (students, postdoctoral employees, faculty, or staff) in this project, other than Professor XYZ.

If COMPANY is considering employment of any University of Illinois students or staff, Professor XYZ will notify the Head of UNIT in writing by updating their RNUA.

In the event that a student working at COMPANY enrolls in a class taught by Professor XYZ, Professor XYZ will notify the Head of UNIT, and grading for that course will be reviewed by the Head or designee.

Faculty, staff or students who work on SBIR/STTR projects sponsored by COMPANY at the University should be informed that a faculty member has an interest in COMPANY and that they may contact the Conflict of Interest if they have any concerns regarding their role in the sponsored research project.

# Relationship between the Company and the Faculty Member’s University Research

Professor XYZ maintains an active program of research and teaching at the University. The involvement with COMPANY is separate from Professor XYZ’s University responsibilities. Professor XYZ agrees that their first responsibility is to the University and that only applied research not appropriate, or whose funding is not available, to the University will be conducted by COMPANY. Funding and other resources that support Professor XYZ research program at the University and the direction of that research program are not to be used to support COMPANY unless contractual arrangements are made with the University.

Professor XYZ will separate their primary role as a faculty member at the University of Illinois from the role as co-Founder of COMPANY. For example, when travel is funded by one of the organizations, Professor XYZ will not deliver presentations or engage in marketing and outreach activities on behalf of the other organization. In publications and presentations, Professor XYZ will articulate the relationship between the role as an author/presenter and the two organizations.

In the event that COMPANY subcontracts research activity to the University, the use of facilities and people, including research assistants and their tuition, will be compensated in full. Research subcontracted to individuals in the University will be subject to the standard grants and contracts review process, and will complement and not conflict with their University responsibilities. The PI of any subaward to the University must be different from the PI of the prime award. A University employee overseeing the activities and/or financial decisions of COMPANY may not award sponsored funding to him/herself as a PI or to his/her research program at the University.

In the event that COMPANY is a subawardee on a sponsored research project at the University, the Unit Executive Officer of the unit administering the grant, or his or her designee, will review and approve any invoices submitted to the University by COMPANY.

In the event that a client of the Company supports research at the University, any research activity involving the client and Professor XYZ should be reviewed by the Management Oversight Committee and pre-approved by the Unit Head.

In the event that Professor XYZ submits and administers sponsored research projects through a unit on campus other than UNIT, Professor XYZ will provide a copy of their most current RNUA and this management plan to the unit executive officer and business office of that unit.

In the event that Professor XYZ, in their University capacity, seeks to procure services or products from COMPANY, Professor XYZ will notify the unit executive officer and business office of the unit procuring the service or product of their interest in COMPANY. Professor XYZ will work with the University’s Purchasing and Contracts Management Office to make necessary vendor disclosures and provide information needed for conflict review by the State Procurement Officer.

Approval of effort reports and requests for travel or other reimbursements by Professor XYZ from either sponsored or institutional funding will be overseen by the Head or designee.

Should Professor XYZ serve as an investigator on a project sponsored by the Public Health Service, significant financial interests will be disclosed to disclose the University as required by 42 CFR Part 50 Subpart F.

# Management of Conflicts of Interest Concerning Use of University Resources and Intellectual Property

Any use of University facilities or equipment by COMPANY will be covered by a technical testing agreement, or a facilities use agreement, by means of which all costs will be reimbursed to the University.

COMPANY will not utilize University personnel in support of company activities (e.g., scheduling company meetings, making purchases, writing proposals).

Professor XYZ is obligated to disclose to the OTM all intellectual property developed in their laboratory in which the University has an ownership interest and that has the potential to be brought into practical use for public benefit or for which disclosure is required by law.

If COMPANY wishes to utilize any University intellectual property, the company will negotiate an appropriate license with the University.

# Review Cycle

The Head will review Professor XYZ’s annual Report of Non-University Activities, and will either approve it or convene the Management Oversight Committee for further review.

This plan can only be modified with the written consent of all signatories.

# Attachments

# List of inventions that Professor XYZ has disclosed to OTM and its predecessors

**Acknowledgement of Agreement**

By signing below, I acknowledge my intent to comply with University’s Policy on Conflicts of Commitment and Interest and with the principles and procedures laid out in this Conflict of Commitment and Interest Management Plan.

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| Professor XYZ  Department of WWW | |  | | Date | |
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| **Management Oversight Committee**  By signing below, I acknowledge that I am willing to serve on the Management Oversight Committee and that I concur with the terms of this Conflict Management Plan. | | | | | | |
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| Professor DDD Department of EEE |  | | Date | |
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| Professor FFF  Department of GGG | |  | | Date | |
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| Professor MMM Department of NNN | |  | | Date | |

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| Approvals By signing below, I acknowledge that I approve of Professor XYZ’s outside activity with COMPANY, as described in this Plan, and concur with the terms of this Plan. | | | |
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| Professor VVV, Head  Department of UUU |  | Date |
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| IF NEEDED  Associate Director  Institute for III |  | Date |
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| Professor CCC, Dean  College of TTT |  | Date |
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| Linda K. Lee Drozt  Conflict of Interest Officer |  | Date |

**Appendix A. Table of University Personnel and their Involvement with the Company** (attached as an appendix, should include their status as university or non-university) (also if appointments are split between University and company, it’s good to delineate responsibilities on each side) (format of this is variable).

| **Current Employees** | **UIUC Title** | **Company Title** | **Responsibilities to the University** | **Responsibilities to the Company** |
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**RESOURCES**

1. **University’s Policy on Conflicts of Commitment and Interest**, <https://www.vpaa.uillinois.edu/rnua/coci_policy/COCI_policy_2018>

**2. Examples of COI disclosure language and mechanisms and frequency for disclosure**

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| **Nature of COI** | **COI Management Plan Strategy** | **Example Language** | **Mechanism** | **Frequency** |
| Individual | Disclose relationship/interest to research team members and collaborators | *I have financial interests in/relative to [insert company name and/or nature of IP], a company which could potentially benefit from the outcomes of this research. Because of the perception of a conflict of interest and in the interest of full transparency, I am disclosing my financial interests in/relative to [insert company name and/or nature of IP], to my research team members and collaborators. If you have questions or concerns relative to my financial interests as they relate to this research, please let me know. If you have questions or concerns relative to data integrity or research participant safety at any time because of this conflict of interest, you may contact your or the University of Illinois at Urbana-Champaign Conflict of Interest Office (*[*coi@illinois.edu*](mailto:coi@illinois.edu) *or 217-333-0034).* | In research team lab or other meeting | * At study initiation or when CMP is implemented * As new research team members and/or collaborators join project |
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| Individual | Disclose relationship/interest in presentations, publications, and press releases related to/arising from research | *I have financial interests in/relative to [insert company name and/or nature of IP] which could potentially benefit from the outcomes of this research.* | * Per publication guidelines * Per meeting guidelines * Within initial slides of presentations | * At time of publication submission * At time of presentation (or at time of submission of proposal to present) |
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| Institutional | Disclose University of Illinois’s relationship/interest in presentations, publications, and press releases related to/arising from research | *The University of Illinois has financial interests relative to [insert nature of interest here (e.g., intellectual property interests in product under evaluation or equity interests in the company sponsoring the research)].  As a result of these interests, the University of Illinois could ultimately potentially benefit financially from the outcomes of this research.* | * Per publication guidelines * Per meeting guidelines * Within initial slides of presentations | * At time of publication submission * At time of presentation (or at time of submission of proposal to present) |
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| Institutional | Disclose University of Illinois’s relationship/interest to human research participants in informed consent form(s), as applicable | *The University of Illinois has financial interests relative to [insert nature of interest here (e.g., intellectual property interests in product under evaluation or equity interests in the company sponsoring the research)].  As a result of these interests, the University of Illinois could ultimately potentially benefit financially from the outcomes of this research.* | * At protocol application submission * At the time of consent | * Per IRB guidelines |