Conflict of Interest Committee Charter

The Conflict of Interest Committee (COIC) is a University-wide, standing faculty committee with representation from a broad cross section of academic disciplines.

The COIC functions as an independent and objective party to monitor the university’s financial conflict of interest reporting process, internal control systems, and auditing functions as they relate to COI disclosures and management plans.

The purpose of the COIC is to protect ECU and its integrity of research and the academic enterprise from conflicting influence of outside interests such as industry/university partnerships, personal investments, textbook authorship, and consulting. The COIC’s recommendations guide the decisions of senior administration on acceptability of engagement of faculty, staff, and students, with outside entities.

In assessing University activities, including research projects, for potential conflicts of interest, the COIC is guided by policies established by the State of North Carolina, the Public Health Service (PHS), the National Science Foundation (NSF), The UNC system office, and ECU. The COIC operates within a University policy that seeks to achieve a balance between faculty outreach, public service and consulting, industry/university collaborations and obligations to maintain the public trust. The COIC reviews the financial interests of Covered Individuals, including those involved in research projects sponsored by PHS, NSF, private industry/business and other non-governmental agencies, as well as human subjects research referred by ECU’s Institutional Review Board (IRB).

Mission

The COIC is charged with ensuring that an employee’s personal financial interests or commitment to entities outside the University do not compromise or appear to compromise his or her objectivity in providing clinical care, performing research, educating and mentoring students, or reporting the results of research conducted under the aegis of ECU.

Authority and Responsibilities

The COIC promotes objectivity by carrying out its responsibilities for the review of personal financial interests related to outside activities disclosed by Covered Individuals and making determinations about whether those outside financial interests constitute conflicts of interest, which must be resolved or managed.

The Committee is charged with making recommendations about how those conflicts of interest can be eliminated, reduced, or managed to a level acceptable to the University. All individuals who are key personnel on federal grants or listed on human subject research protocols are included in the COIC’s review.

In this role, the COIC serves as the substantive independent review committee required under the State of North Carolina and as the “designated official(s)” required under federal policy/regulation on financial conflicts of interest related to research.
To fulfill its mandate, the COIC conducts individualized reviews. These reviews consider such factors as the nature and magnitude of the disclosed financial interest(s), the type of activity, and the investigators’ role/responsibilities to identify situations in which financial or other personal considerations may impact the proposed activity.

Review and disposition of financial disclosures that do not meet the threshold of a significant financial interest (SFI) as well as other COI disclosures, may be delegated to another University entity having sufficient expertise to adjudicate such disclosures.

Policies
The COIC is charged with the interpretation and implementation of the University’s Conflict of Interest policy. It has discretion and authority to issue interpretive guidance as it deems necessary to assist Covered Individuals in their understanding of and compliance with the rules contained in the University’s policy. In the event of any dispute over appropriate application of the policy, the Senior Associate Vice Chancellor for Research will decide how the policy shall apply to the facts of a specific case.

Oversight of Implementation
The COIC shall approve the procedures through which compliance with the policy is effectuated, monitored, and enforced. This will include development of the procedures through which information related to conflicts is disclosed, conflicts are identified and managed, and non-compliance is uncovered, investigated, and sanctioned. Part of this responsibility includes assuring that the policy is applied in a consistent manner across the University.

COI Management Plan Oversight Committee
An ad hoc oversight subcommittee consisting of the Committee Chair or other representative of the COI Committee, representative of ORIC, and the Department Chair representing the employee’s department for whom a management plan has been developed, will serve as the oversight committee to ensure compliance with the COI Management Plan. In the case of a Department Chair who has a COI Management Plan in effect, the Dean or other designated representative will serve on the ad hoc oversight committee.

Organization

Review of Charter
This Charter will be reviewed and reassessed by the Conflict of Interest Committee at least annually, and any proposed changes will be submitted to the Sr. Associate Vice Chancellor for Research, Economic Development, and Engagement for approval.

Annual Committee Goals
The COIC will establish annual goals specifying its principal work focus areas for the coming year. Examples might include

- Determine special areas of potential risk related to COI management
- Review procedures for ensuring compliance with COI management plans
- Review the website for appropriate COI information, ease of navigation, and recommended improvements
- Assess new tools and software to aid in the evaluation and management of COI disclosures and management plans
Membership/Structure/Quorum
The COIC serves in an advisory capacity to the Senior Associate Vice Chancellor for Research, Economic Development, and Engagement, and members of the committee are appointed by the Senior Associate Vice Chancellor for Research, Economic Development, and Engagement who also serves as the Institutional Official (IO).

The Committee will consist of a minimum of five and not more than nine voting members which includes a Committee Chair and Vice Chair. The Chair will be appointed by the Senior Associate Vice Chancellor for Research, Economic Development, and Engagement and be appointed for a one-year renewable term.

Other members will be appointed to staggered two-year terms. Ideally, each College and School will be represented with membership on the Committee.

The Committee will include ex officio, non-voting members listed below whose expertise may provide invaluable advice and strategy for the committee to consider:

- Assistant Vice Chancellor for Research in Academic Affairs
- Assistant Vice Chancellor for Research in Health Sciences
- University Counsel
- Director, Office of Research Integrity and Compliance (ORIC)
- Executive Director, Innovation and New Ventures (or designee)
- Director, Office of Research Administration (ORA)
- Director, Materials Management

All Committee members should have a working familiarity with federal, state, and university conflict of interest policies. Appropriate steps should be taken to enhance members’ familiarity with conflict of interest policies and procedures through participation in educational programs conducted by the Office of Research Integrity and Compliance.

Reporting Channels
The Committee reports to the Senior Associate Vice Chancellor for Research, Economic Development, and Engagement.

Staff Designee
The Conflict of Interest Officer (COIO) is a representative of the Office of Research Integrity and Compliance and serves in an advisory capacity to the COIC. The COIO may be delegated certain operational or administrative responsibilities in support of the COIC.

The COIC is further supported in its administrative functions by the University Program Associate assigned to ORIC who is tasked with publishing the annual meeting schedule, coordinating and disseminating meeting agendas and supporting documents, arranging meeting space, and taking meeting minutes.

Meetings
The COIC will convene every other month or when necessary at the call of the Committee Chair. Meeting dates and times will be published for the calendar year on the ORIC website.

A quorum will be required for any action requiring a vote of the membership. A quorum is achieved with the attendance of a majority of its voting members. Committee members may
participate by teleconference provided all members have access to all the same documents under review and consideration.

No member of the Committee may participate (except to provide information requested by the Committee) in the review or determination of a conflict of interest matter in which he/she has or expects to have a financial interest or any other conflict.

---

**Agenda, Minutes, and Reports**

Agenda items for each meeting will be submitted to the University Program Associate in ORIC who is tasked with providing administrative support to the Committee. Agenda items should be submitted two weeks prior to the scheduled meeting. Agendas and all supporting documents will be provided to committee members no later than five working days in advance of any scheduled meeting.

A meeting of the Committee and actions taken by the Committee will be recorded in the form of official meeting minutes. ORIC will provide administrative support to carry out this function.

Meeting minutes will record the following:
- the date, time, and location of the meeting
- members present
- members absent
- whether quorum is present (voting cannot take place in the absence of a quorum)
- summary of discussion of each agenda item with special emphasis on controverted issues and resolution
- results of agenda items requiring a vote (for; against; abstentions)
- decision/disposition

The Committee will receive and review the following reports:
- Annual completion of COI disclosures
- Report of Issued COI Management Plans
- Report of COIs related to human subject research
- Annual plan and report, respectively, from the internal auditor as it relates to COI compliance
- Updates on important COI issues that have developed since the previous meeting and management responses
- Conflict of interest disclosures and pertinent background information developed by the Conflict of Interest Officer and/or University Counsel