

**Conflict of Interest Committee Charter**

The Conflicts of Interest Committee (COIC) is a University-wide, standing 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 conflict of interest management process related to research and/or sponsored projects.

The purpose of the COIC is to protect ECU and its integrity of the research enterprise from conflicting influence of individual external interests such as industry partnerships, personal investments, and consulting activities. The COIC’s recommendations guide the decisions of senior administration on acceptability of engagement of faculty, staff, and students, with outside entities as it relates to research and/or sponsored projects.

In assessing University activities involving 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 persons identified as “investigators” on 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). Investigators are defined as any person responsible for the design, conduct, or reporting of research.

**Mission**

The COIC is charged with ensuring that an individual connected with the university through employment or registration in an academic program, who is identified as an investigator on a sponsored project and who has 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 faculty, staff, and students 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. Individuals with a significant financial conflict of interest who are paid from externally sponsored grants or contracts or listed on human subject research protocols may be 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 significant 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 individual or entity having sufficient expertise to render a decision on 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 employees 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 Provost 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 University regulation on Conflicts of Interest is effectuated, monitored, and enforced as it relates to management plans. Part of this responsibility includes assuring that the regulation is applied in a consistent manner across the University.

**Organization**

*Review of Charter*

This Charter will be reviewed and reassessed periodically when deemed necessary.

*Membership/Structure/Quorum*

The COIC serves in an advisory capacity to the Provost.

The Committee will consist of a minimum of five voting members which includes a Committee Chair and Vice Chair. The Chair will be appointed by the Provost.

Ideally, each College and School will be represented with membership on the Committee.

The Committee will include *ex officio* members listed below whose expertise may provide valuable advice and strategy in consideration of the issues brought before the committee.

*Ex officio* members (or designees) identified below, will serve in an additional capacity as a sub-committee of the COI Committee, as necessary, with the responsibility of reviewing in advance, any faculty start-up initiated SBIR/STTR proposals where ECU is identified as a sub-awardee.

* University Counsel
* Director, Office of Research Integrity and Compliance (ORIC)
* Director, University and Medical Center Institutional Review Board (UMCIRB)
* Executive Director, Office of Licensing and Commercialization (OLC)
* Director, Office of Research Administration (ORA)
* Director, Materials Management
* Associate Vice Chancellor & Chief Human Resources Officer (as required)

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 conflicts 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 Provost.

*Staff Designee*

The Conflicts 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 an ORIC staff member who is tasked with publishing the 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 on the ORIC website. Meetings may be held in person or virtually.

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 conflicts 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 ORIC 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