

January 7, 2009

To: Peter Gilkey and committee
From: Rob Horner
Re: Considerations for COI/COC policy and process

Peter, thank you for assuming the leadership of this process, especially given the growing array of other responsibilities that you have accepted. My understanding from our first meeting is that we wish to use (a) review of the material by committee members, and (b) comment on the materials from the university community to identify specific ways that the COI/COC policy and process may be improved. I welcome the opportunity to participate in this effort. Here is an initial set of possible editorial considerations given my experience with the process.

Content Considerations

1. Logic Model: Incorporate the logic model into the formal policy to allow a one-page summary of the criteria and contingencies associated with the policy.
2. One day in Five: Change the One-day-in-Seven policy to be a "One-day-in-Five" policy. No change would be made in the number of days that trigger a Standard or Complex review, but days of activity performed on weekends would not count in the analysis.
3. Revenue Generation: Change the salary limit that triggers Standard and Complex review to "49% of 1.0 FTE salary level"
4. Advance Approval: Advance approval should be required only if a university employee goes beyond the "basic" level of activity. In addition, the completion of COI/COC disclosure should constitute advanced approval for the coming year as long as the coming year is within the standards approved in the COI/COC disclosure management plan.
5. Student Employment: The current policy holds the potential for limiting student employment. A more formal role for third person review may be a strategy for easing this potential conflict, yet retaining protection for students.
6. Book publishing: The current policy (with the tech transfer requirements) has the potential of establishing disincentives to the writing of material that is sold through a publisher. This is a contingency that should be avoided, but may require modification of more than the CIO/COC policy.

Procedural Considerations

1. The commitment to transparent process is essential to the success of the introduction of this process. I think you are very sensitive to this issue, and I support your plans to exaggerate procedural transparency as much as reasonable.
2. As the University plans to roll out implementation of this policy:
 - a. Consider first providing training and orientation for Dept Heads, Deans, and Institute Directors (e.g. the people who may be writing Management Plans).
 - b. Ask each Dept or College to select 5-10 individuals to test the policy.

- i. Use information gleaned from these tests to complete a future revision of the policy.
- c. Coordinate the timing of the COI/COC disclosure to fit the federal tax submission schedule. This will allow people to assemble their tax information and use much of the same content to report COI/COC information.
- d. If a management plan is required by ORCR, then ORCR should have the obligation of stipulating the core elements that are needed for any management plan. Avoid the cyclical process of submitting a management plan and being asked to conduct revisions. Note that this requirement will constitute a significant task for ORCR initially.

Again, thank you for coordinating this process, and for providing the organizational leadership. Please let me know if this format for suggestions is what you want. I am very willing to modify to fit your requirements.