

CONFLICT OF INTEREST AND COMMITMENT MANAGEMENT PLAN GUIDANCE

THE PROCESS

The drafting of a management plan should include the faculty member or other UO employee, his or her direct supervisor, and in some cases the Department Head or Director and the Dean. All may consult with the staff of the Office for Responsible Conduct of Research (ORCR) as to the necessary elements of the plan.

Some management plans are simple enough to be included in the disclosure itself. Comment space has been left within the COI-C Disclosure Form for this purpose. Management plans that are more complex may require longer explanation. A Management Plan template has been created to facilitate this, and can be found at <http://orcr.uoregon.edu>.

Once they are complete, management plans must be signed by the faculty member, the supervisor, the Department Head or Director, and the academic Dean. Once these signatures are obtained, the document is submitted formally to the ORCR to facilitate review and approval by the appropriate Vice President, Vice Provost or Senior Vice Provost. In complex cases, disclosures and management plans may be brought to the Conflict of Interest-Commitment Committee (COICC), a committee comprised mostly of faculty peers, who review disclosures and accompanying management plans and may provide further guidance and recommendations with regards to management plan strategies.

Once approved, the disclosure and management plans are valid for the remainder of the calendar year. Only if a material change to the faculty member or other UO employee's disclosed information occurs during the year, would an individual have to disclose more frequently. An example of what is NOT considered a material change includes but is not limited to additional consulting days of a similar nature and compensation to those already disclosed that do not approach or exceed the faculty member's use of one-day-in-seven time. An example of a material change includes but is not limited to ownership of interest in an external entity, a line management position in an external entity, and/or a significant financial remuneration for a single consulting contract (\$25K or more).

The institutional, approved copy of record for all Disclosures and Management Plans will be held by the ORCR. Deans, Department Heads and Directors can keep a copy of these documents in an individual's personnel records, the ORCR will also provide copies to Deans, Department Heads, Directors and other University officials upon request. A copy of any signed documents will be provided to the faculty member, once fully executed.