

3361:10-17-08

Conduct and ethics: policy on conflicts of interest in the conduct of research at the university of Cincinnati.

(A) Rationale

The university of Cincinnati is committed to maintaining the highest ethical standards in research conducted by its faculty and staff by identifying potential financial conflicts of interest and taking the necessary actions to manage, reduce, or eliminate them.

(B) Scope

This rule applies to all university faculty and staff involved in designing, conducting, or reporting research as part of their university duties.

(C) Reporting of financial interests

(1) Employees engaged in research shall fully disclose all financial and other interests on an outside activity reporting form "OAR" as required by rule 3361:30-21-01 of the Administrative Code and any policies issued by the president of the university pursuant to that rule.

(2) Any university official or committee charged with the review, approval, or oversight of research for the purpose of identifying and managing conflicts of interest shall have access to the "OAR" forms of university faculty and staff engaged in research to the extent necessary to conduct such review, approval, or oversight.

(D) Training

All employees engaged in research must complete training regarding the university's conflict of interest policies and the employee's responsibilities thereunder prior to proposing or engaging in research.

(E) Standing committee on conflicts of interest

(1) The president of the university will appoint a standing committee on conflicts of interest. The committee shall be composed of seven members serving three year terms with staggered rotation. The

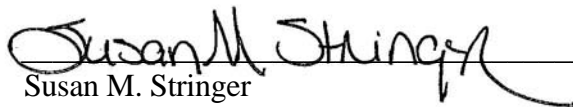
members shall have sufficient breadth of research experience and knowledge of university policies and federal and state laws governing conflicts of interest in research to provide substantive analyses of the activities and relationships submitted for review. Four members shall be appointed by the president and three shall be selected by the faculty senate. The president shall appoint two faculty members in the college of medicine who engage in research and two faculty members from the college of engineering who engage in research. The president may also appoint non-voting ex-officio members. The committee shall adopt written procedures to govern the submission and review of potential conflicts of interest, subject to the approval of the president and the vice president for research.

- (2) The vice president for research or the dean of any college may refer potential conflicts of interest to the committee to review. Where the committee determines that a conflict exists, the committee shall provide to the vice president for research written recommendations to manage, reduce, or eliminate the conflict of interest. The vice president or the vice president's designee shall issue a decision adopting, rejecting or modifying the determination and recommendations of the committee.
- (3) A researcher who disagrees with the decision of the vice president for research may appeal by delivering a written notice of appeal to the vice president within fourteen calendar days of the date of the decision is sent to the researcher.
 - (a) Upon receipt of a notice of appeal, the vice president for research shall appoint a three member ad hoc committee to consider the appeal.
 - (b) Within thirty days of its appointment, the ad hoc committee shall complete its review and send its recommendation to the vice president for research or the vice president's designee, who shall make a final decision and send written notification to the individual and to the standing committee.
 - (c) The vice president for research shall adopt written policies governing the appeal process.

(F) Compliance with federal law

The vice president for research shall promulgate policies as necessary to comply with federal laws governing conflicts of interest in research funded or regulated by the federal government.

Effective: June 12, 2012

Certification: 
Susan M. Stringer
Executive Assistant to the Board of Trustees
and Senior Vice President for Administration and Finance

Date: May 24, 2012

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