PURDUE
UNIVERSITY

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» Contact Information
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Send C-1 and C-35 forms to:
Peter Dunn
University Conflict of Interest Officer
Office of Research Administration
HOVD 335

Conflict of Interest: Policies and Management

Review and Management Process

When a potential COI is identified, then a COI review is triggered. The basis for such a review is the University Policy on Conflict of Interest (Executive Memorandum C-39), Federal Regulations, and Indiana State Laws.

- The Purdue University employees (including employees and Purdue University students identified as having a conflict of interest in sponsored project/technology transfer activities) must complete the Forms 32A, 35 and C-1 and submit them to the University Conflict of Interest Officer to provide full disclosure.

- The Conflict of Interest Officer initiates a review of the disclosures to determine whether the financial or management interests disclosed could be managed appropriately.

- If it is determined that no conflict exists, Form 32A is approved and the Employee, the Head of the academic unit, and the Dean of the School will receive a copy of the approved form. A copy will also be deposited with the Personnel Records.

If the COI Officer determines that **the conflict can be managed**, then:

- o The COI Officer drafts a Management Plan in the form of a Memorandum of Understanding (MOU) between the Employee and the University and identifies an appropriate Oversight Manager (usually the Department Head or his/her designee) to monitor the proposed activities. This MOU will be signed by the Employee, his Oversight Manager, the Dean of the appropriate School and the Provost (or other, appropriate University Executive Vice President).

- o If the COI Officer decides that a Financial COI exists, Form C-1 is submitted for approval to the Board of Trustees of Purdue University and, when approved, transmitted to the State Board of accounts.

An appropriate management plan must be in place before the University will accept any sponsored award or technology transfer agreement in which a financial or management conflict is judged to exist. The conflict of interest review committee will monitor any management plans established and, as part of that management, requires Annual Certification of compliance with the Management Plan from the appropriate Oversight Manager (here is a sample Annual Review Form). The Employee may accept the management plan or seek modification by appealing in writing to the University Conflict of Interest Officer, Dr. Peter Dunn. If the Employee does not accept the final management plan, the Sponsored Program Services (in the case of a sponsored project proposal) or OTC (in the case of a technology transfer agreement)

will be instructed to withdraw the proposal/agreement.

Appeal Process

Completed Forms 32A, 35 and C-1 are reviewed and approved or disapproved by the Department Head who will forward the application to the Dean for approval/disapproval. For final review, this form is forwarded to the Office of the Provost or the Office of Executive Vice President and Treasurer. Disapproval by the Department Head can be appealed to the Dean. Disapproval by the Dean can be appealed to the Provost or the Executive Vice President and Treasurer. Final appeal is to the President.

Financial Conflict of Interest FAQ

- What is a Financial Conflict of Interest (FCOI)?
- Who is Responsible for Managing FCOI?
- How Does This Affect Me? - Employee Obligations
- Do I have a Financial Interest That Must be Disclosed?
- How do I Disclose a Financial Interest Associated With University Employment?
- How do I Identify COI in Sponsored Research, Technology Transfer and/or Relationships with Outside Organizations?
- NIH and NSF Disclosure Requirements

Managing Conflicts of Interest

- Process Description and Management Mechanisms
- Managing COI in Consulting

Contact OVPR@purdue.edu with questions or comments for the VPR office.