August 24, 2012 – Conflict of Interests Committee Procedure: Review of Outside Financial Interests

Review of Outside Financial Interests

The Conflict of Interests Committee (COI Committee) is charged by CWRU Conflict of Interest (COI) policy with review of reported individual and institutional outside financial interests. There are three routes for review:

- Administrative review
- Review by Administrative Subcommittee
- Full COI Committee review

The results of reviews will be communicated in writing to the individual via email or hard copy. Results of administrative or Administrative Subcommittee reviews may be shared with COI members upon request.

A. Administrative Review is review by the Conflict of Interests Committee Chair or his/her designee, as well as the Director. All outside financial interests reported to the COI Committee are administratively reviewed. The administrative reviewers can refer any item to the Administrative Subcommittee or to the full COI Committee for further review. Administrative review alone is sufficient for reports of external financial interests that fall into these categories:

- Outside financial interests determined and/or designated not reportable (e.g., affiliate hospital salary or the budget of a sponsored project through the University).
- Financial interests that do not represent a conflict of interest (COI) per CWRU COI policy (there is no relationship between outside financial interests and University responsibilities, including research).
- Outside financial interests related to research that represent a COI but are below the significance threshold.
- Outside financial interests not related to research that represent a conflict of interest, but are below the significance threshold.

B. Administrative Subcommittee review is review by the members of this subcommittee of the Conflict of Interests Committee. The Administrative Subcommittee members are appointed by the Chair. The Administrative Subcommittee has the responsibility and authority to review items as requested by the administrative reviewers. The Administrative Subcommittee can refer any item to the full COI Committee for further review. Administrative Subcommittee Review alone is sufficient for reports of outside financial interests that fall into these categories:

- Items that the Chair and Director determine require additional review, but which do not meet the criteria for full committee review.
- Outside financial interests not related to research that exceed the Department of Health and Human Services (DHHS) threshold for significance and have been determined administratively to be a possible COI.
- Outside financial interests not related to research that involve the institution and/or institutional official(s) and have been determined administratively to be a possible COI.

C. Full COI Committee Review: The full COI Committee reviews items referred by the administrative reviewers or the Administrative Subcommittee. The COI review process may include assessment by a primary reviewer as requested by the Chair. The full COI Committee reviews items that fall into the following categories:

- Outside financial interests (individual and/or institutional) related to research that fall above the DHHS threshold for significance.
- Other items as referred by the Chair and Director, or by the Administrative Subcommittee.