



Conflict of Individual and Institutional Interest in Research Committee (COIIR)

Purpose

The purpose of the Committee is to review disclosed significant financial interests (SFI) and determine and maintain oversight of any perceived or real conflict arising directly or indirectly from research, whether sponsored or non-sponsored research, start-up ventures, or other activities that require objectivity under circumstances that could be influenced by institutional or personal financial gain. When Conflicts of Interests (COI's) are identified, the Committee is responsible to manage, reduce or eliminate assessed conflicts.

Authority and Responsibilities

The Conflict of Individual and Institutional Interest in Research (COIIR) Committee is an enterprise-wide standing Committee and has the authority to conduct or authorize investigations into any matters within its scope of responsibilities. It is primarily empowered to:

- Review all disclosed significant financial interests (SFI) made by research personnel
- Review all disclosed significant financial interest by covered officials that have oversight of research
- Review all innovation to which RUSH has an interest
- Manage, reduce or eliminate conflicts
- Make recommendations regarding policies related to conflict of interest as they relate to RUSH
- Impose sanctions when non-compliance is detected (see policy [CC-RC- 0008](#))

Meetings and Reports

The Committee will meet as needed. A majority vote will be achieved by at least 3 voting members.

The Office of Research Compliance will submit an annual report to the Vice Provost for Research (who serves as the Institutional Officer) summarizing the actions taken around the timing of the Fiscal Year (FY) survey and will keep the Institutional Officer (IO) apprised of COI management issues. The AVP for Research Compliance and COI will submit summaries to the Audit Committee of the Board of Trustees.

The COI Program staff will report key performance metrics to the COIIR annually which will include all committee actions including, volume and determinations by category. In addition, these reports will be shared with the President of the University who will disseminate to the Board of Governors at least annually. Key performance metrics will be shared with the University Executive Management Committee (UEMC) at least annually.

Composition

The President of the University appoints the Committee members that are composed of faculty, researchers, deans from each of the four (4) colleges (or their designee) and representatives from RUSH Legal and the following ex-officio, non-voting members: the AVP of Research Compliance; an Intellectual Property/Technology Transfer representative; a Rush IRB Chairperson as a liaison to/from the Rush IRB. The President will appoint at his/her discretion ad-hoc members if further faculty representation or non-Rush staff is desired.

In the instance of a tie vote the Chairperson of the Committee is permitted to vote to carry *or* strike down the motion.

Conflicts for Committee Members, Consultants, or Observers

Committee Members must recuse themselves from any discussion and deliberation at a Committee meeting on a particular matter under the following conditions:

- The individual has a personal or outside interest in the matter or,
- The individual has a personal or outside interest because of particular relationships involved in the matter (*e.g.*, spouse, collaborator).

The Committee may, in its discretion, invite a conflicted member to stay for the discussion of an issue, but not vote.

Record Retention

The COI Program staff will retain records of all research financial disclosures and corresponding actions taken by the COIIR with respect to conflicts of interest and is required to keep all records as follows:

- For grants or cooperative agreements – retain records for three years from the date of submission of the final expenditures report or, where applicable, from other dates specified in 45 C.F.R. 74.53(b) for different situations.
- For research contracts – for three years after final payment or, where applicable, for the other time periods specified in 48 CFR part 4, subpart 4.7.