



## Procedures

# Disclosure Review and Management Process for USF Research Projects (General)

University of South Florida  
Research & Innovation  
Research Integrity & Compliance  
Conflict of Interest Program

# USF CONFLICT OF INTEREST PROGRAM

<p><b>USF Conflict of Interest Program Disclosure Review and Management Process</b></p>	<p><b>Revision 4: March 2020</b></p>
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# PART I GENERAL INFORMATION

## 1. Overview

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### A

#### **Introduction**

This is the Disclosure Review and Management Process to be used by the Conflict of Interest Program (COI Program), Research Integrity & Compliance (RIC).

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### B

#### **Purpose**

The purpose of this document is to provide guidance to the COI Administrator, administrative staff of the COI Program, and the COI Committee regarding receipt, assignment, review, distribution and maintenance of Significant Financial Interests and Relationships disclosures submitted to the COI Committee for review and adjudication.

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## PART II RECEIPT OF DISCLOSURE

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### 2. Receipt and Notification to COI Administrator

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**A Disclosure Receipt** The disclosure review and management process begins when a disclosure is received in the COI Administrator's inbox in the eCOI System ("Disclosure").

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## PART III PRELIMINARY ADMINISTRATIVE REVIEW

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### 3. Establish Jurisdiction

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**A Analysis and Determination** The COI Administrator will review the Disclosure to determine whether review by the USF COI Committee is appropriate in the judgment of the COI Administrator. If review is not appropriate, the COI Administrator will notify the administrative staff to redirect the Disclosure to the appropriate review body or to handle in some other manner as directed by the COI Administrator.

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**B  
Telephonic  
Meeting**

*Notification of members.* The COI Administrator will advise the COI Committee members via the eCOI System of the need for a telephonic Committee meeting and the justification for the expedited review.

*Staff duties.* Administrative staff will:

- coordinate the conference call with the voting members (and any others who wish to attend) and ~~set~~ call for the earliest available time when a quorum of voting members ~~can~~ attend;
- update the public schedule on the COI Program ~~web~~ site to provide the requisite public notice for the meeting at least ~~seventy~~ (72) hours in advance of the meeting, ~~with~~ the conference call information included;
- arrange the conference call ~~with~~ the service provider; and
- notify the attendees of the time and date of the call and the conference call number and other pertinent information

*Telephonic meeting.* At the appointed time, the members and the COI Administrator will attend the conference call and, upon establishing a quorum, will discuss and take action on the agenda.

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## 8. Convened Committee Review

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### **A Regularly Scheduled Meeting**

*Notification of members.* The regular meeting schedule of the COI Committee is posted on the COI Program website.

Additionally, the COI Administrator will notify the COI Committee members of the upcoming meeting date, time and location prior to the meeting and will create the agenda for the meeting via the eCOI System.



## 10. Deferral

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### **A Analysis and Determination**

If the COI Committee determines that it cannot approve the Proposed Management Plan based on the information provided, and

- the issues presented cannot be resolved at the currently convened meeting due to lack of required information or for any other reason; and
  - the issues involved require further discussion by the full Committee
- then the Committee may elect to defer the matter for discussion at a future meeting.
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### **B Deferral**

After the meeting, the COI Administrator will identify the issues resulting in deferral and initiate resolution of the issues via communication with the Interested Person or other sources.

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