*Upon review of this Investigator’s disclosed outside activities and/or interests, the RCOI Committee has determined that there is a potential for a real or perceived conflict of interest that could directly affect or bias the design, conduct, or reporting of research at UTA. The purpose of this Management Plan (MP) is to implement* CONTROL MEASURES *and* DISCLOSURE REQUIREMENTS *to mitigate, manage, or eliminate the potential research conflict of interest. It is understood that in today’s research enterprise, conflicts are inherent. The key to handling these potential conflicts is full disclosure of the situation to allow it to be mitigated or managed. This MP documents the investigator’s case in a fully transparent manner and outlines his/her responsibilities intended to protect the integrity of research, the Investigator, and UTA.*

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| **Investigator Name:** |  |
| **Title:** |  |
| **Department:** |  |
| **Contact Information:** |  |

1. **DESCRIPTION OF POTENTIAL RESEARCH COI**

*Provide the following details in the box below, in order:*

* 1. *Describe your status/title at UTA, and the focus of your research here;*
  2. *Provide the name(s) and location(s) of the outside entities for which you have an interest, affiliation, or relationship;*
  3. *Describe your interest, affiliation, or relationship with each entity (i.e., employment, consultant, owner, founder, CEO, CTO, board member, etc.);*
  4. *Describe the type/focus of work or research conducted by the outside entities;*
  5. *Summarize the potential conflict of interest with the following basic statement (you may expand it with additional details if desired): The potential research conflict of interest is that [name]’s outside interests or commercial activities could be perceived to bias current or future research activities at UTA.*

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**\*\*In addition to providing the summary above, complete APPENDIX A – SUPPLEMENTAL INFORMATION\*\***

1. **MANAGEMENT PLAN CONTROL MEASURES**

*You are responsible for safeguarding the interests of the University and its faculty, staff, and students. To help mitigate your potential COI, you must adhere to the* CONTROL MEASURES *described below. Carefully review each one and ensure you fully understand your obligations. If there is one you do not understand, request guidance before proceeding.*

* 1. Your primary responsibility is to UTA and your University duties and responsibilities. You must direct all opportunities and activities to UTA when UTA can or should perform them, instead of to the outside entity.
  2. Except for pre-publication review consistent with UTA policy, scholarly and research activity cannot be restricted due to your commercial activities/outside interests, including the ability to receive, analyze, interpret, or publish data and research findings.
  3. For students, faculty, or staff that you supervise, you must ensure that your commercial activities/outside interests will not interfere with their ability to fulfill requirements of their academic program or job duties.
  4. You will not use University property including equipment, facilities, or other resources for your commercial activities/outside interests without a formal, written agreement with UTA. See [Regents Rule 60306](https://www.utsystem.edu/board-of-regents/rules/60306-use-university-resources).
  5. UTA faculty, staff, or students that you supervise cannot be employed by your commercial/outside entity without prior disclosure and review by RCOI Committee.
  6. If your outside entity donates any materials, equipment, or any free resources to you or UTA, you will disclose those to your Department Chair and the RCOI Committee prior to acceptance.
  7. If research/projects covered by this MP are supported by federal funds, those funds cannot be utilized until this MP receives final approval. Funding may be suspended if you fail to uphold the control measures and disclosure requirements of this MP.
  8. You must maintain an up-to-date COI Disclosure ([Mentis System](https://mentis.uta.edu/public/#coi/index/index)) and recertify the Disclosure at each submission of a grant proposal, IRB, or IACUC protocol. You must report within 30 days any changes in financial interests, changes that alter the information in this MP, or changes in the role of staff and/or duties of any UTA employees engaged in research under your supervision.
  9. You must disclose any intellectual property developed to the Office of Innovation and Commercialization (OIC) as required by [UTA’s IP Policy](https://policy.uta.edu/doctract/documentportal/08D8961BD07A6EF38A06A1230E154BB9) specifically the following:
     1. intellectual property (UTA and non-UTA) *where you are an inventor* and any patent applications resulting from those inventions;
     2. UTA IP disclosures must include the date and title; non-UTA IP disclosures must include the date and a non-confidential/non-trade secret description of the subject matter.
  10. You must submit a Management Plan **Monitoring Report** to the RCOI Committee by the anniversary of your MP approval date to include a progress update and description of how each control measure and DISCLOSURE REQUIREMENT from this MP has been fulfilled or completed.
  11. You are responsible for maintaining documentation of your disclosures and of applicable control measures for the duration of the MP and having records accessible to the RCOI Committee or UTA Administration as requested.
  12. Prior to approval of this MP and every 4 years thereafter, you will complete the required training module, “[Conflicts of Interest in Research: Disclosure, Management, and Reporting](https://ra.uta.edu/ra/real/researchspace.php?view=).”
  13. You must review and uphold the University’s [Policy for Disclosure, Management, and Reporting of Financial Conflicts of Interest in Research](https://policy.uta.edu/doctract/documentportal/08D885C804E4E8E612AA2F247DDE620D).
  14. The RCOI Committee or UTA may require additional control measures specific to your case. Additional control measures, if any, are described in Appendix B.

1. **MANAGEMENT PLAN DISCLOSURE REQUIREMENTS**

*The primary method of managing a potential or perceived conflict of interest is transparency. This is achieved through appropriate disclosures to affected individuals, agencies, or the public.*

[***How to Disclose***](https://www.uta.edu/research/administration/departments/rs/conflict-of-interest/disclosure-in-publications-and-presentations.php)***:*** *For each* disclosure requirement*, you have two options depending on what is appropriate for the occasion:*

1. *Sample Disclosure Statement: Provide the following basic statement, such as in presentations and publications (you may expand it with additional details if desired):* “[Dr. /Mr. /Ms. name] has a potential research conflict of interest due to a financial interest with [name of entity]. A management plan has been created to preserve objectivity in research in accordance with UTA policy.”
2. *Copy of Management Plan: As an alternative, you can provide a full copy of this Management Plan to fulfill your disclosure requirement, in cases where it might be appropriate to provide additional information (for example, when disclosing to your supervisor).*

*\*Note that* ***all disclosures must be provided in writing****, and* ***you will be required to report*** *your method of disclosure (option 1 or 2 above) and the date of disclosure in your Monitoring Reports.*

[***When to Disclose***](https://resources.uta.edu/research/regulatory-services/conflict-of-interest/disclosing-research-conflicts-of-interest-coi-in-publications-and-presentations.php)***:*** *To mitigate or minimize your potential COI, you must adhere to the* disclosure requirements *described below. Review each one carefully. If there is one you do not understand, request guidance before proceeding.*

* 1. You must provide a disclosure in all **presentations** when the topic of the presentation could be perceived as being related to your COI or outside interest. *Use the sample disclosure statement provided above.*
  2. You must provide a disclosure in all **publications** (journal submissions, abstracts, press releases initiated by you, theses, dissertations, etc.) in compliance with the publisher’s policies for COI disclosure. It is your responsibility to seek out and review those policies. *Use the sample disclosure statement provided above.*
  3. You must provide a disclosure in all **grant proposals and progress reports** in compliance with the sponsor’s policies for COI disclosure. It is your responsibility to seek out and review those policies. *Use the sample disclosure statement provided above.*
  4. You must provide a disclosure to all **UTA faculty, staff, or students whose research is under your supervision** within 30 days of your MP approval date and to new personnel within 30 days of their start date. These disclosures must explain to the personnel that if they have concerns, they should contact their Chair, Dean, VP, or the Office of Regulatory Services. *The sample disclosure statement provided above can be utilized; however, it is recommended to provide a full copy of your Management Plan when appropriate.*
  5. For UTA faculty, staff, or students *that you supervise in research*, you must **confirm that *they* include a disclosure of *your*** **RCOI** **in *their* publication**, when required by the publisher’s COI disclosure policy. For individuals that are not under your direct supervision *but where you have provided IP, materials, or resources related to your outside commercial interests*, you must inform them to include a disclosure of *your* RCOI when required by the publisher’s COI disclosure policy. *Use the sample disclosure statement provided above.*
  6. For UTA individuals that you supervise or individuals you have provided IP, materials, or resources related to your outside commercial interests, you must **inform them to provide a disclosure of *your* RCOI in *their* presentation** *if the content may be perceived as related to your RCOI or commercial interest*. *Use the sample disclosure statement provided above.*
  7. If you supervise graduate students, you are required to provide a disclosure of your COI to the **student’s thesis/dissertation committee**. *The sample disclosure statement provided above can be utilized; however, it is recommended to provide a full copy of your Management Plan when appropriate.*
  8. You must provide a disclosure to your **supervisor** within 30 days of your MP approval date and in an update/status report on an annual basis thereafter. These disclosures must explain that if s/he has concerns, they should contact their Chair, Dean, VP, or the Office of Regulatory Services. *Provide a full copy of your Management Plan to your supervisor.*
  9. If you are a **graduate student**, you must provide a disclosure of your COI to your thesis/dissertation committee within 30 days of your MP approval date. This disclosure must explain that if they have concerns, they should contact your Chair, Dean, VP, or the Office of Regulatory Services. *Provide a full copy of your Management Plan to your committee.*
  10. You must provide a disclosure to any **co-investigators, collaborators, and co-authors** (UTA or non-UTA) when you have determined a COI disclosure needs to be included in the collaborative work (publication, presentation, grant proposal). *The sample disclosure statement provided above can be utilized; however, it is recommended to provide a full copy of your Management Plan when appropriate.*
  11. You must provide a disclosure to the **IRB, IACUC, or other applicable regulatory committees** when your COI may be perceived as related to a human/animal research protocol. *Provide a full copy of your Management Plan to the relevant committee.*

1. **Investigator Certification***\*Note: UTA reserves the right to modify this Management Plan and to impose new or additional conditions. Such modifications, conditions, and additional terms will be effective immediately and incorporated into this MP. Investigator will be notified of these changes via email. Investigator will be deemed to have accepted these terms and conditions unless s/he appeals, which must be done in writing and submitted to the RCOI Committee.*

**I confirm and agree to the following terms and responsibilities:**

1. I certify that the information provided by me in this Management Plan is true and correct to the best of my knowledge and belief.
2. I understand and will uphold each control measure and disclosure requirement implemented by this Management Plan to minimize or mitigate any potential or perceived conflicts of interest in research.
3. I certify that I will conduct my research in a manner that ensures that the objectivity and impartiality of the research results will not be affected or influenced by my relationship with an outside entity.
4. When the Institution requests additional information for the purposes of making a determination or evaluation pertaining to the potential conflict of interest, I agree to provide sufficient information on a good faith basis, meeting deadlines established by the Institution.

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| **Signature:** |  |
| **Date:** |  |

**APPENDIX A – SUPPLEMENTAL INFORMATION**

*Complete each of the tables/sections below. You will be required to review and update these on an annual basis for completion of your Monitoring Report. It is suggested that you maintain a copy of this Appendix in Word format to simplify your monitoring report process next year.*

1. **SPONSORED RESEARCH AND GIFT ACCOUNTS**

*List all current/active sponsored research projects and gift accounts under your control (including private industry, federal grants, foundations, internal funding, etc.). If you do not have any, enter “None.”*

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| **Sponsor Name:** | **Project Title:** | **Who is the Primary Recipient of Funding (UTA, or Name of the External Entity)?** | **Dollar Amount:** | **Time Period:** | **Your Estimated % Effort on This Project:** |
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1. **INTELLECTUAL PROPERTY**

*List all invention disclosure reports, patent applications, issued patents, and license agreements (pending or active) filed by you, UTA, or any other entity that name you as an inventor. If you do not have any, enter “None.”*

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| **ID Number:** | **IP Description (i.e. Patent Title):** | **If Patent Exists, List Who Filed It:** | **Inventor(s):** | **Disclosure Date or Patent Application Date:** | **Is it Licensed? (Yes/No)**  **If Yes, Date of License:** |
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1. **UNIVERSITY AGREEMENTS**

*List all active University agreements related to your RCOI/outside activity (Facilities Use Agreements, Contracts, Subcontracts, Material Transfer Agreements, MOUs, etc.). If you do not have any, enter “None.”*

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| **Agreement Type:** | **Brief Description of the Agreement Terms and Dates of Coverage:** |
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1. **UTA PERSONNEL UNDER YOUR SUPERVISION**

*List all UTA students, faculty, or staff currently under your supervision at UTA including their role and source of compensation. For each person, clarify (column 3) whether they have any involvement (employment, internship, financial interest, etc.) in the same entity as your outside interest.* *If you do not supervise anyone, enter “N/A.”*

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| **Name:** | **Title/Role on Project:** | **Is S/He Involved with Your Outside Interest? If Yes, Describe How:** | **List Who Provides Their Compensation (UTA Grant, UTA Internal Funds, or List the Name of Outside Entity Funding):** | **Approx. Start Date (mm/yy):** | **Approx. End Date (mm/yy):** |
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**APPENDIX B – ADDITIONAL CONTROL MEASURES**

*Depending on your specific case, the RCOI Committee or UTA Administration may assign one or more of the additional* CONTROL MEASURES *described below. You must adhere to any selected* CONTROL MEASURES *as part of your Management Plan.*

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| **Required? (Yes/No)** | **CONTROL MEASURE** |
| **NO** | * + - 1. Following initial disclosure to your supervisor, you will provide them with RCOI updates at the frequency specified below (e.g., monthly, quarterly), maintain records of these updates for the duration of this MP, and make them accessible to the Research COI Committee if requested.   Name of Supervisor: Title: Report Frequency: |
| **NO** | * + - 1. You must enlist an independent, designated individual to oversee and evaluate performance of (or make changes to) the employment status of any UTA faculty, staff, or students that you supervise who also have involvement with and/or equity interest in your RCOI-related outside entity.   Name of Designated Individual: Title:  Signature: |
| **NO** | * + - 1. For any sponsored research project related to this RCOI, a co-investigator or designated, independent individual will be required to have primary oversight and decision-making responsibility (both internally and with the sponsor). You must refrain from:           1. Participating in any financial negotiations with the sponsor;          2. Approving expenditures charged to the award;          3. Independently submitting sponsor-required deliverables; and          4. Independently negotiating technical requirements on behalf of the UTA.   Name of Designated Individual: Title:  Signature: |
| **NO** | * + - 1. You will designate an individual who is independent/impartial to the outside entity (Co-PI, faculty member, Chair, Dean, etc.) to serve as an Oversight Manager for this MP. Complete and submit Appendix C (with Oversight Manager’s signature).   Name of Oversight Manager: Title: |
| **NO** | * + - 1. You must enlist an independent, designated individual to monitor your academic progress to ensure that it is not negatively impacted/delayed due to your RCOI. The Academic Monitor must be at UTA and cannot be related to your RCOI/outside interests. You must provide your Academic Monitor with a full copy of your Management Plan.   Name of Academic Monitor: Title:  Signature: |
| **NO** | * + - 1. Other: |