

## Management of Conflicts of Interest: Roles of Oversight Committees Policy

Conflict of Interest (COI) Management Committees occasionally determine that Oversight Committees are needed to assure that investigators' financial interests in external entities do not interfere with the integrity of the investigators' decision-making in their university roles.

This document describes the responsibilities of those committees.

### Oversight Committee Structure

All Oversight Committees should consist of at least three members:

- The associate dean from the investigator's college that serves on the COI Management Committee or his/her designee. The associate dean (or designee) would serve as chair.
- A person not reporting to the investigator or involved in the external entity who is knowledgeable in the general area of investigator's field of research and can help determine whether there is bias in the design, conduct, or reporting of research conducted in projects of concern.<sup>1</sup> This person may be in the same or different department than the investigator.
- A person in a different department or college than the investigator and not involved in the external entity who is knowledgeable in the general area of investigator's field of research and can help determine whether there is bias in the design, conduct, or reporting of research conducted in projects of concern.

Additional members may be required:

- If the Principal Investigator on an Iowa State University Project plans to subcontract to an Entity in which s/he has a significant financial interest (SFI), the fiscal officer from the investigator's college or his/her designee.
- If major equipment or service purchases or COI vendor purchases are anticipated, a representative of the Purchasing Department.

---

<sup>1</sup> Projects of concern are projects that involve both an investigator in his/her ISU role and an Entity in which the investigator has a significant financial interest.



## Oversight Committee Procedure

Oversight Committees must meet, either in person or virtually, at least once every six months or as dictated by the COI Management Committee, to review scientific presentations, progress reports, final reports, and manuscripts generated in Iowa State University's role (collectively, "ISU Documents") on projects of concern to ensure Investigator's compliance with the public disclosure requirement and to assure, to the extent possible, that there is no bias in the design, conduct, or reporting of the research based on the Investigator's financial conflict of interest.<sup>2</sup> If the project of concern includes a subcontract to an external entity in which the Iowa State University PI has a significant financial interest, the oversight committee will also review the subcontractor's invoices and reports as required by the Subcontract, Scope of Work, the Prime Agreement, and the ISU Principal Investigator (collectively, "Entity Documents").

Upon notification of a scheduled Oversight Committee meeting and/or request to the ISU PI from a member of the Oversight Committee, the ISU PI or his/her designee will provide ISU Documents electronically to all Oversight Committee members. It is up to the discretion of the Oversight Committee to determine whether they wish to have the ISU PI or his/her designee present at the meeting to answer questions/provide clarification on ISU Documents. The ISU PI will be contacted for clarifications if needed.

If the ISU PI subcontracts to an Entity in which s/he has an SFI, the Oversight Committee will receive Entity Documents in the following manner:

- The Subcontractor will submit invoices to Sponsored Programs Accounting (SPA) as stated in the subcontract. Once the invoice is received by SPA and forwarded to the department/center grant coordinator, s/he will send the invoice to a designated member of the Oversight Committee for approval.
- The Subcontractor will submit reports as required by the Subcontract, Scope of Work, the Prime Agreement, and the ISU Principal Investigator to both a designated member of the Oversight Committee and the ISU Principal Investigator.
- If the Oversight Committee requires additional information from the Subcontractor, a member of the committee will contact the Subcontractor's Principal Investigator to request the information.

The associate dean (or designee) must report back in writing the results of the review to the COI Management Committee prior to the annual COI Management Committee meeting, or more often as conditions warrant.

---

<sup>2</sup> In the design of experiments, scientists may be unconsciously biased to choose approaches likely to provide "marketable" findings, rather than those designed to increase basic understanding of mechanisms. In the collection of data, a researcher with significant financial interests may unwittingly introduce bias into evaluation of data dependent on subjective judgments, or even into the reading of objective measurements. Finally, unintentional bias could alter choices about data selection, statistical methods, and presentation of results. See <http://research-ethics.net/topics/conflicts-of-interest/#discussion>.