

Checklist of Elements in Unit Implementation Policies on Conflicts of Interest and Conflicts of Commitment University of Michigan

Before submitting draft unit implementation policies for review, it would be helpful for units to review their draft policies to ensure that they include all the elements described below, as required in the [procedures](#) for Standard Practice Guide [201.65-1](#) *Conflicts of Interest and Conflicts of Commitment*.

_____ Professional expectations and responsibilities

Expectations and responsibilities that the unit associates with professional appointments and other job classifications within the unit.

_____ Procedures for disclosure

Procedures faculty members and staff members in the unit must follow to disclose potential or actual conflicts of interest and conflicts of commitment.

The unit's procedures for disclosure **must**:

_____ **Refer to Standard Practice Guide [201.65-1](#) *Conflicts of Interest and Conflicts of Commitment***

_____ Require prompt disclosure of potential COIs and COCs

Require all faculty members and staff members to promptly and fully disclose matters that may present a potential COI or COC, as they arise or are identified.

_____ Identify disclosure intake person

Identify the individual(s) to whom faculty and staff should disclose potential or actual conflicts of interest or conflicts of commitment

_____ Identify examples of COIs and COCs in the unit

Identify a set of situations relevant to activities in the unit that could create a COI or a COC or the appearance of a COI or a COC.

_____ Describe how the unit will evaluate potential COIs and COCs

Identify the individual(s) who will evaluate potential COIs and COCs and a description of the evaluator's roles, responsibilities, and a list of University resources for consultation and support in carrying out the evaluator role.

_____ State unit expectations of faculty/staff who disclose potential COIs/COCs

Make a statement that, as requested by the designated COI and COC evaluator, faculty and staff who have disclosed potential COIs or COCs must promptly provide additional information that the evaluator needs to carry out his or her role.

In addition, the unit's procedures for disclosure **may**:

_____ **Specify a unit disclosure form:** Specify the unit's requirements with regard to a COI/COC disclosure form suitable to the mission of the unit and the specific activities that may represent a COI or COC. *Note: Such a form needs to be approved as part of the review process.*

_____ **Provide examples of possible COIs or COCs** to reflect the areas in which disclosure may be required in the unit, and

_____ **Procedures for interfacing with key UM offices**

Procedures by which the school, college, or administrative unit implementation policies will interface with the separate disclosure requirements of key offices with which the unit commonly interacts (e.g. Purchasing Services and the Office of the Vice President for Research).

_____ **Procedures for managing potential COIs and COC fairly and consistently**

Procedures that the dean, director, or head of the unit will follow in evaluating disclosures and managing conflicts of interest and conflicts of commitment, so that unit practice is fair and consistent.

_____ **A location and procedures for securing and managing COI/COC records**

The location in the unit and the procedures the unit will follow to secure records related to COIs and COCs, to respond appropriately to requests for access to the records, and to purge the records at the appropriate time. For more information, see FAQs: Questions from Academic Leaders and Supervisors, "How long do I need to keep records related to disclosures and conflict management plans?"

_____ **Procedures for handling alleged policy violations**

The procedures that the dean, director, or head of the academic or administrative unit will follow when responding to alleged violations of this policy.

_____ **Standards and procedures about gifts**

The standards and procedures that govern faculty and staff actions in the unit with regard to soliciting and accepting gifts

_____ **Procedures for handling concerns and disputes**

The procedures a school or college will follow when a faculty or staff member expresses concerns about the scope or details of a plan to eliminate or manage a conflict of interest or conflict of commitment (see SPG [201.65-1](#), Section III.C.6 and Section V), which may be a standing faculty committee activity and/or existing dispute procedures.

_____ **Description of unit plan to educate faculty and staff about COI/COC policies**

A description of the school, college, academic or administrative unit program to educate all faculty and staff, on an ongoing basis, about conflict of interest and conflict of commitment.