

## **Research Contracts Conflict of Interest (COI) Management Plan University of Wisconsin--Whitewater**

The University of Wisconsin—Whitewater (UW-W) follows the University of Wisconsin System Board of Regents Policy 13-6, Contracts with Research Companies, as the guiding document for managing conflicts of interest of UW-W employees. Policy 13-6 is as follows:

### **Regent Policy Document 13-6**

#### **Contracts with Research Companies**

##### **Scope**

This policy applies to all University of Wisconsin System institutions when a contract with a research company is subject to Wis. Stat. § 946.13.

##### **Purpose**

The purpose of this policy is to define the required elements of a management plan issued in relation to a contract between a UW System institution and a research company where Wis. Stat. § 946.13 may apply.

##### **Policy Statement**

The Board of Regents recognizes the right of UW System employees to personal financial interests and the duty of the UW System to ensure that UW System activities are conducted with integrity. Where Wis. Stat. § 946.13 applies, the following elements must be incorporated into a management plan issued by the appropriate UW System institution's institutional body or individual responsible for evaluating and managing potential conflicts of interest:

1. **Reporting of outside activities.** The university employee must submit annual and updated reports of outside activities consistent with institutional requirements and processes.
2. **Use of university facilities and services.** Any activity involving the use of university facilities or services for the benefit of the research company must be conducted in accordance with all institutional and

system policies and state and federal laws pertaining to the use of university facilities and services. Except with respect to use of facilities and services made available for general public use in accordance with established rates and conditions applicable to all users, any such activity must be approved by the university employee's Dean, Director, Division Head or their designee, and a written and approved contract is required before the activity begins.

3. **Contract negotiation, approval and signature.** The university employee may not negotiate or sign any contract with the research company on behalf of their institution. In addition, any such contract's terms and budget must be approved by the university employee's Dean, Director, Division Head or their designee.
4. **Invoicing and billing.** The university employee may not be responsible for invoicing or billing the research company, or for institutional decision-making should any issue regarding the research company's performance under a contract with a UW System institution arise. Any such decisions must be made by an impartial party who is not under the supervision or control of the university employee.
5. **Purchases.** The university employee may not be directly involved in making decisions involving the purchase of items or services from the research company. Any such decisions must be made by an impartial party who is not under the supervision or control of the university employee.
6. **Human resources matters.** The university employee may not be directly involved in any final institutional decision-making regarding their institution's employment of any individual who the university employee knows has a significant financial interest in the research company. Any such decisions must be made by an impartial party who is not under the supervision or control of the university employee. If a Dean, Director, or Division Head has a financial interest in the research company, a higher-level administrator must be responsible for all necessary approvals referenced in this policy.

## **Example COI Management Plan for UW-W Employee**

### Background

1. Employee's name, position, and department at UW-W.
2. Details on the nature of the outside interest/relationship and the employee's level of involvement.
3. Any other relevant information on the situation as it exists or its history.
4. Given the relationship between employee, the outside interest, and UW-W, there is a potential for conflict of interest. In order to assure compliance with UWS/BoR Policy 13-6, Employee agrees to abide by the following safeguards.

### Safeguards

Safeguards explain how the conflict will be managed and may cover such categories as:

1. COMMITMENT
2. TRANSPARENCY
3. AVAILABILITY OF OUTSIDE COUNSEL
4. RESEARCH INTEGRITY
5. USE OF STUDENTS
6. MONITORING

Legal Statement required on all COI Plans: Employee acknowledges that UW-W will monitor and evaluate this plan as well as policies related to it, and, at any time should UW-W determine, in its sole discretion, that the plan is not sufficient to guard actual or apparent conflicts of interest or is otherwise not in the interest of UW-W, may determine the conflicts as not capable of management and may ask employee not to pursue the conflicting activities while an employee of UW-W.

## Acknowledgement and Agreement

By signing below, I, Employee, acknowledge my agreement and intent to comply with the principles and safeguards of this COI Management Plan.

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Signature of Employee Date

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Signature of Plan Manager Date

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Signature of Compliance Manager Date