Conflicts of Interest and Commitment
w/ University Employment
(Excessive time spent on external endeavors, use of USF resources/name/students in furtherance of private interests, waiver of USF IP rights in private agreements)

Conflicts of Interest in Research
(Personal financial interests that may bias the design, conduct or reporting of USF Research)

General Conflicts of Interest
(Nepotism, Doing Business w/USF in Private Capacity, Board/Committee Membership, Purchasing Decisions)
Institutional Objective

To provide an infrastructure that facilitates compliance with internal and external laws, regulations, policies, and procedures and targets industry standards and best practices in the review and management of conflicts of interest in all areas of University operations.
Institutional Objective requires university to assess and monitor conflicts of interest

- Across diverse areas
- Involving faculty, staff and students
- With varying risk factors
- Different degrees of external regulation
- Under the control of separate University administrators
Goals

- Uniform treatment of diverse COI areas
- Clear responsibility for oversight/development of policies and processes
- Centralized expertise and information for benefit of end users
- Attention afforded to high risk and under-regulated areas of COI
Level I. Organization and Accountability of Individual COI Units/Programs

A. Identify individual COI “units” or “programs”
B. Recommend assignments of individual responsibility for COI oversight in various areas (i.e., shared responsibility is no responsibility)
C. Evaluate each existing unit or program in relation to COI requirements, industry standards and best practices
D. Make recommendations to address specific concerns arising from the program evaluation
Level II. Integration and Coordination of COI Activities

- **Discuss:** a comprehensive website for University employees to describe the diverse areas of COI and the policies, processes, training opportunities and contact info applicable to each COI Unit/Program.
- **Discuss:** the need to develop and coordinate consistent messages at employee orientation, end user, and other training programs as appropriate across the various classification levels.
- **Discuss:** the need to integrate COI disclosure, review and management processes where possible to reduce institutional and employee and institution “paperwork” and to avoid duplication of effort.
- Make proposals and recommendations to ICEC related to the integration and coordination of COI activities.
COI Workgroup: Membership

12 Members:

- Camille McWhirter-Chair (Institutional Conflicts of Interest/USF & Health)
- Dwayne Smith-Vice-Chair (Outside Activity & Nepotism-Faculty/USF & Vendor Interactions--Main Campus)
- Michael Stephens (OA & Nepotism-Staff/USF & Health)
- Tom DiBella (Employees as Vendors & Purchasing Agents/USF)
- Olga Joanow (OA & Nepotism-Faculty/Health)
- Patsy Bickel (Vendor Interactions--Medical Center/Health)
- Liz O’Connell (COI in Research-Disclosure & Reporting/USF)
- Vinita Witanachchi (COI in Research-Review & Monitoring/USF & Health))
- Joan Bailey (Financial Aid & Lender Relationships/USF)
- Valerie McDevitt (Tech Transfer Issues/USF)
- Theresa Chisolm (Faculty Rep/USF)
- Bill Marshall (Faculty Rep/Health)
Part I: Describe the Program

A. **Need**: A statement of need describes the problem or opportunity that the program addresses and implies how the program will respond.

B. **Expected effects**: Descriptions of expected effects convey what the program must accomplish to be considered successful.

C. **Primary Risks**: Identify the primary risks associated with an ineffective program.

D. **Activities**: Describe specific steps, strategies, or actions in a logical sequence. This demonstrates how each program activity relates to another.
E. **Resources**: Resources include the time, talent, technology, information, money, and other assets available to conduct program activities.

F. **Stage of development**:

1. *Planning*. During planning, program activities are untested, and the goal of evaluation is to refine plans.
2. *Implementation*. During implementation, program activities are being field-tested and modified; the goal of evaluation is to characterize real, as opposed to ideal, program activities and to improve operations, perhaps by revising plans.
3. *Effects*. The goal of evaluation is to identify and account for both intended and unintended effects.
Part I: Describe the Program (con’t)

G. **Context:** Descriptions of the program’s context (e.g., history, geography, politics, social and economic conditions, and efforts of related departments) within which the program operates. Understanding these environmental influences is required to design a context-sensitive evaluation.

H. **(Optional) Visual description:** Demonstrate visually how issues are brought to the program and resolved (or not resolved as the case may be). In other words, use a flow chart, map, or table to portray the sequence of steps leading to program results.
Part II: Identify Program Effectiveness Targets

A. Regulatory requirements targets
   • What rules apply (laws, regulations, agency policies, University policies)
   • To whom (staff, faculty, students, researchers, sub grantees, etc.)
   • To what functions (procurement, research, employment, etc.)

B. Industry standard targets

C. Best practices targets
Part III: Evaluate Program Effectiveness

A. Compare University policies/practices to
   • regulatory requirements
   • industry standards/guidance
   • best practices at other institutions

B. Identify “gaps” or deficiencies in existing policies, processes or programs that inhibit program effectiveness
Use the *Sample Program Evaluation* as a model to describe your own COI Unit and the regulatory/standards/best practices that apply to your program.

Send me the completed template by Monday, January 7, 2008.

Call on me for help with any aspect of the Program Evaluation—I am here to assist you at [cmcwhirt@health.usf.edu](mailto:cmcwhirt@health.usf.edu) or 974-6676.
Initial meeting on October 24, 2007
Identified all responsible parties for COI at the University
Assigned responsibility for individual COI program evaluations (part 1 and 2)
Prepared program evaluation template and sample program evaluation.
Established deadline for submission of program evaluation (part 1).
- Part 1 (description and program effectiveness targets) due to Workgroup Chair by January 7, 2008.
- Part 2 (assessment and recommendations) due to Workgroup Chair by __________, 2008.
- Meet to discuss and prepare proposal for recommendations to ICEC.
- Present recommendations to ICEC.