

## **URMC Conflict of Interest Compliance**

The Dean of the School of Medicine and Dentistry has the authority to impose sanctions against faculty members because of failure to comply with the Faculty Policy on Conflict of Commitment and Interest.

Dean David Guzick and Senior Vice President for Health Sciences Bradford Berk have approved the following measure to promote compliance with the University of Rochester's conflict of interest policies:

“If the Dean of the School of Medicine and Dentistry or the Dean's designee has determined that an actual or potential research conflict of interest exists and must be reduced or managed, and the investigator does not exhibit due diligence in the timely formulation and submission of a conflict of interest management plan, or the investigator fails to comply with an approved conflict of interest management plan, the Dean of the School of Medicine and Dentistry has the authority to suspend enrollment of study subjects in any clinical study, or take any other administrative action with respect to any research study that is impacted by the actual or potential conflict of interest.”

The process for doing this will be accomplished as follows:

- The Associate VP for Research will inform the Dean's Conflict of Interest Advisory Group (“CIAG”) of the efforts that have been made to obtain the timely cooperation on the part of the faculty member, or of the faculty member's failure to comply with their approved management plan;
- After consideration, CIAG may recommend that the Dean suspend enrollment, and/or take any other administrative action, with respect to any affected studies;
- The Dean (or the Dean's designate) will notify in writing the faculty member, the faculty member's chair, the Conflict of Interest Committee, and the RSRB or the WIRB contact within OHSP, if necessary, of the forthcoming suspension and/or of the other administrative action to be taken, at least one week prior to the effective date, with instructions to the faculty member of the action that must be taken to avoid the suspension or other action;
- If the investigator has not taken the appropriate action by this date, the Dean's suspension of enrollment in the study, and/or other administrative action shall become effective, and shall remain in effect until a completed conflict of interest management plan has been fully executed.

The faculty member may appeal the decision pursuant to the General Grievance Procedure outlined in the University Faculty Handbook.

This is not intended to limit the application of any other disciplinary measures available to the Dean, the Senior Vice President for Health Sciences and other University officials under School of Medicine and Dentistry, Faculty and University policies, procedures and guidelines.

### History:

Adopted January 2, 2007

Amended August 1, 2008