

## Conflicts of Interest Procedures and Management Plans

A conflict of interest exists when an individual's financial interests or other opportunities for tangible personal benefit may compromise, or reasonably appear to compromise, the independence of judgment with which the individual performs his/her responsibilities at the University.

CHM Bylaws: 4.2.2.2. The charge to the Conflict of Interest Committee shall be to implement the college-approved Conflict of Interest Policy of the College. The committee will receive reports, approve management plans, and adjudicate concerns. The committee will make its recommendations to the dean. The committee will also serve as a forum for the generation, receipt, and discussion of policy recommendations regarding conflict of interest in the college.

### Clinical Service

1. Interactions with industry (pharmaceutical and device manufacturers).
  - Members of the MSU HealthTeam will follow rules or procedures as described in Health Team Policy CP-4 and CMP-22.
  
3. Direct Sale of Health-Related Goods or Services
  - 3.1 Individuals may sell health-related goods or services directly to patients only in accordance with an approved conflict of interest management plan.
    - The unit chair and the CHM Conflict of Interest Committee will not recommend approval of a conflict of interest management plan unless it explains:
      - The unique patient benefit that direct sale makes possible.
      - The quality assurance mechanisms that will be used to monitor and evaluate the appropriateness of recommendations for the goods or services being sold.
      - This policy does not apply to usual and customary medical services.
  
4. Ownership or Financial Interests in Ancillary Services or Facilities
  - 4.1 Individuals may have ownership or other financial interests in services or facilities to which their patients are referred only in accordance with an approved conflict of interest management plan.
    - The unit chair and the CHM Conflict of Interest Committee will not recommend approval of a conflict of interest management plan unless it explains:
      - The unique patient benefit that the relationship makes possible.
      - The quality assurance mechanisms that will be used to monitor and evaluate the appropriateness of referrals.
      - The mechanisms that will be used to ensure compliance with fraud and abuse laws.
      - Individuals will report each year their ownership or financial interests in services or facilities to which their patients are referred.
      - These reports will be referred to the unit chair, who will forward them to the CHM Conflict of Interest Committee. The individual report from the chair will be forwarded to the Dean and the CHM Conflict of Interest Committee.

## Research and Scholarship

### 5. Financial Interests in Externally Funded Research

5.1 Individuals must report any financial interests including those of his/her immediate family, of any amount, in externally funded research, whether clinical or nonclinical in nature.

5.2 Individuals must report the terms of any contract under which funding is being provided.

- Individuals must report each year to the unit chair, who will forward them to the CHM Conflict of Interest Committee for review.

### 6. Gifts or Grants from Private Industry or Individuals

6.1. Individuals will report the source, the amount, and the terms and conditions of each gift or grant.

- Individuals will also report:
  - The terms of any agreement under which the gift or grant is accepted which may affect the direction, design, conduct, interpretation or publication of research and scholarship conducted within the College or unit.
  - These reports will be referred to the unit chair, who will forward them to the CHM Conflict of Interest Committee for review.

### 7. Consulting and Speaker's Bureau Relationships

7.1. Individuals will report the source, amount of money received, and terms and conditions of each consulting or speakers' bureau relationship.

- Individuals must report any consulting or speakers' bureau relationships with private industry to their unit chair, which will include:
  - The source(s) and the amount(s) of money received by faculty in each calendar year.
  - The terms and conditions of each consulting or speaker's bureau relationship.
  - The unit chair will develop a conflict of interest management plan that will be submitted for approval by the Dean. The unit chair may request that the CHM Conflict of Interest Committee review and comment on the conflict of interest management plan.

### 8. Ghostwritten publications and Plagiarism

8.1. Individuals shall not accept authorship credit for a publication that has been substantially written by someone else.

- Allegations that ghostwritten material has been submitted will be referred to the Dean. The Dean may seek advice from the CHM Conflict of Interest Committee regarding the existence of a conflict of interest.
- Allegations of misconduct in research or creative activities must be referred to the University's Office of Research Integrity pursuant to the University's Procedures Concerning Allegations of Misconduct in Research and Creative Activities.

## Teaching

### 11. Students Performing Services on Faculty Research Projects

11.1 Individuals with supervisory oversight on research projects may not require students to participate in a funded research endeavor as a formal part of a course or training program when the student's services are being provided for an entity in which the individual has a financial interest

- Requests for exceptions to this policy will only be granted in accordance with an approved conflict of interest management plan. The unit chair and CHM Conflict of Interest Committee cannot recommend approval of a conflict of interest management plan unless it explains:
  - The unique educational or training goals that will be served, and
  - The measures to be taken to insure the integrity of student evaluation.

### 13. Personal relationships

13.1 Individuals with teaching or evaluation responsibilities may not participate, either formally or informally, in the evaluation of a student who is related by blood, marriage, adoption, domestic partnership or other personal relationship in which objectivity might be impaired.

- Assignments of students to a class or training experience where they will be supervised, directly or indirectly, by a faculty member to whom they are personally related should be avoided. Where this situation cannot be avoided, another faculty member within the unit or department must be appointed as the evaluator for the student, as approved by the unit chair.

### 16. Attendance at Industry-Funded Courses or Educational Activities

- Individuals will not be required to attend industry-funded or directed courses or other educational activities (unless these are in compliance with Standard 5 of the ACCME Standards for Commercial Support, whether or not CME is being offered).