

University of Southern California
Institutional Conflict of Interest in Research: Policy and Procedure

Date Issued: September 1, 2009

Authority: C.L. Max Nikias
Executive Vice President and Provost

Todd R. Dickey
Senior Vice President, Administration

1.0 Purpose

The objective of this policy is to promote the highest ethical standards in the conduct of research in situations where institutional conflicts of interest (“ICOI”) may occur, and to determine those instances when an ICOI is unacceptable. An ICOI may occur when a financial interest of the University (e.g., investments held by the University in a company) has the potential to bias research conducted by its employees or students, or creates an unacceptable risk to human subjects.

This policy represents one aspect of the University’s commitment to address and manage conflicts of interest. Other University policies that address conflicts of interest include:

- The University’s *Conflict of Interest in Research* policy addresses conflicts of interest that arise from individual financial interests related to research.
- The University’s *Conflict of Interest and Ethics* policy addresses individual conflicts of interest with respect to Employment and Business Practices, Conflict of Commitment, and Personal Conflict of Interest, and requires that university employees not allow a personal or outside interest to interfere with their duties and responsibilities to the University.
- The University’s policy on *Relationships with Pharmaceutical Suppliers, Biotech and Device/Medical Equipment Manufacturer and Other Healthcare Suppliers* addresses consulting and service arrangements, receipt of gifts, and the conduct of research sponsored by pharmaceutical companies, medical device companies, health care suppliers, and their employees or agents.

2.0 Principles

The University of Southern California (“USC” or the “University”) encourages its faculty, staff, and students to participate in meaningful research and to benefit society through the transfer of University-developed knowledge to the public and private sector. The University’s research will

Issued by:	Chrysostomos L. Nikias Executive Vice President and Provost	Todd R. Dickey Senior Vice President, Administration
------------	--	---

Date issued: September 1, 2009

University of Southern California
Page 1 of 6

- Permitting the research to proceed coupled with divestiture of financial interests of the University and individual investigators.

The CIRC will communicate its recommendations, which are advisory, to the Vice Provost for Research Advancement for final determination. The VPRA's decision will be communicated to the relevant IRB, the Department of Contracts and Grants, USC Stevens, the Dean or Department Chair in the school where the research is taking place, and Health Research Association, as applicable. If the research is permitted to proceed at USC, the decision should document the compelling circumstances, and document the plan used to manage the ICOI. The IRB may elect to implement additional safeguards for the protection of human subjects.

6.0 Recusal

As set forth in the University's policy on *Conflict of Interest and Ethics*, any person in a position of authority, including department chair, center or institute director, dean, VPRA or provost, who has a direct financial interest in the outcome of a research project under his or her authority, should recuse him or herself from any decision pertaining to either an institutional or personal conflict of interest in research, or pertaining to any level of oversight over the research project. In case of recusal, a substitute person will be designated by the dean, provost or president to act in place of the recused individual.

7.0 Violations and Sanctions

Failure to report a Conflict of Interest, or refusal to cooperate in the management of a Conflict of Interest, may be cause for disciplinary action. Possible violations of this policy include, but are not limited to, furnishing false, misleading, or incomplete information.

Sanctions for violations of this policy for faculty will be in accordance with all applicable provisions of the policies published in the Faculty Handbook.

Sanctions for violations of this policy for students will be in accordance with all applicable provisions of the policies contained in SCampus.

Sanctions for violations of this policy for staff or other non-faculty employees will be prescribed by the Associate Senior Vice President for Administrative Operations, and may include termination. The Associate Senior Vice President will notify both the department and the non-faculty employee of the prescribed action. Departments are required to implement the remedial or disciplinary action prescribed by the Associate Senior Vice President of Administrative Operations. A non-faculty employee may file a written appeal with the Senior Vice President for Administration within fifteen (15) calendar days of his or her receipt of notice of the disciplinary action.

Issued by:	Chrysostomos L. Nikias Executive Vice President and Provost	Todd R. Dickey Senior Vice President, Administration
------------	--	---

Date issued: September 1, 2009

Any disciplinary action under this policy will take into account the scale of the offense, the individual's intent, and the degree of wrongdoing.

Violations that involve a misrepresentation of research results will be handled according to the University's *Scientific Misconduct Policy*.

Violations of federal or state statutes and guidelines must be handled according to those requirements.

Issued by: Chrysostomos L. Nikias Todd R. Dickey
 Executive Vice President and Provost Senior Vice President, Administration

Date issued: September 1, 2009