

Limited Management Plan

Investigator:
Entity or Entities:

1. Publications and Presentations. Your relationship with _____ (referred to as the entity or entities) may not restrict publication or presentation, although publication may be delayed for the purpose of pre-publication review for a period consistent with UW-Madison policies.

You, your students, fellows, trainees, and other research workers whom you supervise in the course of your research must disclose the relationship with the entity or entities in publications and academic presentations where disclosure is possible and appropriate. For researchers in the biomedical sciences, disclosure in publications should conform to recent uniform disclosure guidelines published by a group of editors of major medical journals (Davidoff et al. JAMA 286: 1232-1234, 2001). (See Appendix A: Disclosing in publications.)

2. Interaction with Students and Staff. The UW-Madison has a duty to ensure that the entrepreneurial activities of its faculty and staff do not have a negative impact on students or research staff, especially on the academic progress of students. To fulfill this obligation, the COI Committee requires that individuals with potential conflicts of interest inform others who may be impacted by the potential conflicts.

You should provide information on potential conflicts of interest to all students, fellows, trainees, and other research workers whom you supervise in the course of your research (hereafter students and staff). The information should include explanations of: a) your relationship with the entity or entities, and b) the right of students and staff to bring concerns about the effect of your relationship with the entity or entities on their work, studies, or progress towards degree to your dean, director, his or her designee, or the COI Committee. The process for providing information should meet the following criteria:

- Includes a written summary of the information for each student or staff member
- Provides documentation that this process has occurred to the COI Committee within 60 days of receipt of this management plan
- Provides any individuals who subsequently join the group comparable information in a timely manner
- Updates documentation to the COI Committee at least once a year

See "Appendix B: Informing students and staff of potential conflicts of interest" for additional guidance.

You must also notify all your co-investigators on federal grants of potential conflicts of interest.

Your relationship with the entity or entities may not place restrictions on the ability of your students and staff to receive, analyze, or interpret data. In addition, students may not participate in research sponsored by the entity or entities, if the terms and conditions of participation would prevent or inhibit them from meeting applicable UW-Madison degree requirements, such as completion and public defense of a thesis or dissertation.

Annually, you must notify the COI Committee and your dean or director in writing of any students and staff involved in the activities of the entity or entities. Such involvement may require modification of this management plan.

The COI Committee recommends that all involvement of students and staff with the entity or entities be conducted under formal University agreements, such as sponsored research agreements or appointments approved by your dean or director's office.

You must direct any of your students and staff with significant financial interests in the entity or entities to make an annual report of outside activities using the on-line process (<https://www.gradsch.wisc.edu/disclose>), if they have not already done so and regardless of whether they would normally be required to make such a report. Any of your students and staff who independently have a reportable significant financial interest in the entity or entities will be reviewed by the COI Committee and may be issued their own management plans.

3. Human Subjects Research. You must disclose your financial interest(s) in the entity or entities to human subjects research participants. UW-Madison IRBs may determine that disclosure of financial interests would be inappropriate and not require it.

4. Reporting of Outside Activities. As a reminder, you are required to submit an annual report of outside activities each spring using the on-line process. In addition, if you have major changes in your outside activities between annual reports, you must update your report. Instructions on how to update an annual report are available on the Graduate School's Conflict of Interest Web Site (<http://info.gradsch.wisc.edu/research/compliance/coi/2.updating.html>).

5. Outside Activities Agreement. A departmental agreement on the appropriate level of outside activities in light of your faculty appointment needs to be established..

Appendix A: Disclosing in publications

The COI Committee provides the following examples to guide investigators disclosing their significant financial interests in publications and presentations. Investigators may use alternative approaches that meet the requirements laid out in the body of this management plan.

- Dr. A has an ownership interest in Company 1, which has licensed the technology reported in this publication.
- The research reported was supported by funding provided by Company 1, Company 2, and Company 3, with which Professor B has significant financial interests.
- Name [A member of Name's family] owns stock in [has stock options with] Company 1.

Additional information on disclosing potential conflicts of interest in biomedical research can be found in:

- Davidoff F, DeAngelis C, Drazen J, et al. Sponsorship, authorship, and accountability. *JAMA*. 2001;286:1232-1234.
- DeAngelis CD, Fontanarosa PB, Flanagin A. Reporting financial conflicts of interest and relationships between investigators and research sponsors. *JAMA*. 2001;286:89-91.

Appendix B: Disclosing to students and staff

The COI Committee provides the following guidance to help investigators communicate the details of conflict of interest management plans. Investigators may use alternative approaches, if they meet the requirements laid out in the body of this management plan.

One effective way to communicate the details of conflict of interest management plans is to hold a meeting to explain the conflict situation, review the provisions of the management plans, and allow participants to ask questions. During this meeting, participants would receive two copies of a written summary signed by the investigator. They would sign and date one copy and return it to the investigator. The investigator would provide the COI Committee a single copy of the written summary and a list of all individuals who received and signed the summary. After an initial meeting, the investigator would speak individually with anyone new who should receive information. The list of individuals who have received information must be updated annually for the COI Committee.

The written summary would be printed on department letterhead and include the following (See example letter below.):

1. Date
2. Description of the investigator's involvement with the company
3. Description of the purpose of the company

4. Description of the relationship between the investigator's professional work (research) at the UW-Madison and the company
5. Description of any relationships between the UW-Madison and the company, such as sponsored research agreements, facilities use agreements, etc.
6. Description of any restrictions placed on the design, conduct, and reporting of research by the company
7. Description of the ownership of any intellectual property resulting from research connected to the company
8. Impartial contacts for students and staff (the investigator's dean or director's designee AND a representative of the COI Committee. See list below.)
9. Investigator's signature
10. Statement of acknowledgement to be signed and dated by the recipient

Staff contacts

Conflict of Interest Committee: Chris Buth Furness (890-1613 or chrisb@bascom.wisc.edu)

College or School	Dean or Director's Designee	Email Address
Agricultural and Life Sciences	Irwin Goldman	ilgoldma@wisc.edu
Education	Mariamne Whatley	whatley@education.wisc.edu
Engineering	Deanna Dietrich	dietrich@enr.wisc.edu
Graduate School	Petra Schroeder	pschroeder@bascom.wisc.edu
Letters and Science	Bill Barker	barker@geology.wisc.edu
Medical School	Steve Harsy	harsy@facstaff.wisc.edu
Veterinary Medicine	Rachel Rothschild	rothschr@svm.vetmed.wisc.edu

Example letter

[Letterhead]

[Date]

To All Personnel in the Laboratory of [PI Name],

This letter is to inform you that I am [List position in company.] of a company called [Name of Company], devoted to research in the areas of [Add text explaining the purpose of the company, your involvement with it, and any connections to the lab.]. My relationship does not carry with it any restrictions on publication, and any associated intellectual property will be disclosed and processed according to UW-Madison policy.

The purpose of this letter is to inform you of this potential conflict of interest, and, if you feel that at any time your academic pursuits and freedoms are compromised by this relationship, that you may contact [Provide contact information for the appropriate dean or director's designee listed above.] or the Conflict of Interest Committee via Chris Buth Furness (890-1613 or chrisb@bascom.wisc.edu).

Sincerely yours,

[Signature]

I acknowledge receipt of the above information on a potential conflict of interest. I understand that I may address questions about this matter to my dean or director's designee or to the Conflict of Interest Committee.

Name: [of recipient]

Date: