The MSU policy on Conflicts of Interest requires reporting of significant financial interests and other potential conflicts of interest through the online disclosure portal at osp.msu.edu. See coi.msu.edu for details about disclosure requirements and process.

When a faculty or staff member has a significant financial interest in an entity that is related to his/her University activities, the interest may create a real or perceived conflict with those duties. The MSU Financial Conflict of Interest Officer (FCOIO) has the responsibility to review all aspects of the financial interest in relation to the individual’s University responsibilities. The FCOIO and Conflict Review Committee make a recommendation about the existence of a conflict of interest to the Vice President for Research and Graduate Studies, who makes the final determination.

In consultation with the individual and the corresponding chair or dean, the FCOIO may develop a Conflict Management Plan to address concerns created by the conflict. The goal of a plan is to ensure that the individual's activities (teaching, research, outreach, etc.) are conducted transparently and responsibly.

Considerations:

When developing a plan for managing potential conflicts of interest, a wide range of existing and potential issues and actions should be considered:

- Ensuring involvement of the individual's chair or dean in assessing the conflict, developing the plan and then monitoring the potential conflict situation;
- Faculty member's responsibility and involvement with support personnel, postdoctoral trainees, and students whose efforts may also relate to the outside entity (see guidance document on Educational / Research Supervision and Conflict of Interest);
- Assuring support personnel, postdoctoral trainees, and students of their right to express concerns privately with either the chair or another responsible official about the effect of the faculty's relationship with the entity on their work, studies, or progress towards degree;
- Compliance with other MSU policies that may also relate to the reported conflict situation (e.g., Outside Work for Pay or Conflict of Interest in Employment), including use of University facilities, supplies and materials, equipment, services, or employees;
- Whether the faculty's outside work will adversely affect the University's interests or violate University policies or regulations;
- Whether the faculty's relationship with the entity would restrict publications or presentations by the faculty, their students, or postdoctoral trainees;
- Whether the faculty will routinely acknowledge and report (in presentations and publications) any direct support from the entity and the fact that the faculty has a financial interest in the entity;
- Ensuring that Intellectual Property rights and licenses of the University and other employees are protected;
- Ensuring independence in purchasing or other procurements from an entity in which an employee has a financial interest;
- Whether stronger measures are required to resolve or eliminate a serious conflict of interest.

Plan Development:

A suitable Conflict of Interest Management Plan need not be in a specific format or length. It should reflect what should be done to ensure transparency and the integrity of the faculty's academic efforts and to protect the collective trust by the public in MSU. Accordingly, it should directly address the situation involving the reported conflicting interest and clearly articulate expectations about:

1) The critical issues of the situation;
2) Required tasks and activities;
3) Timetable for completing each of these tasks; and
4) Who is responsible for each task.

The written plan should be sufficiently detailed to permit review and approval by the Vice President for Research and Graduate Studies.
Examples of management plan elements include the following:

- Regular meetings between the faculty member and the chair or dean to review status of the financial interest and ensure that elements of the plan are being followed;
- Annual reporting by the chair or dean to the FCOIO about issues discussed at meetings described above;
- Public disclosure of the faculty member’s financial interest when presenting or publishing;
- Disclosure to human participants in research;
- Appointment of independent reviewer(s) to monitor research;
- Modification of the research plan (e.g. modifying protocol; changing location of selected activities);
- Change of personnel responsibilities (e.g. appointment of another faculty member to assume leadership for the project or supervision of graduate students or postdoctoral researchers; separating financial decisions from research decisions).

Occasionally, stronger measures may be required to resolve or eliminate a serious conflict of interest. These might include:

- Disqualifying a faculty member from participating in all or part of the situation that gives rise to the conflict;
- Requiring divestiture of the financial interest or severing the relationship that causes the conflict of interest; or
- Deciding not to undertake the activity that gives rise to the conflict.

**Conflict Management Plan Monitoring:**

Responsibilities by the various parties are specified in the Conflict Management Plan, usually including regular meetings between the faculty and the chair or dean and annual reports to the FCOIO. Financial Conflict of Interest office staff follow up at least annually to ensure that elements of the Plan are being followed. Instances of non-compliance with the Plan would be referred to applicable administrators for possible disciplinary action, as appropriate.

**Contact:**

For consultation and assistance, please contact:

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