

## **Conflicts of Interest (COI) Advisory Committee**

### **Background of COI Advisory Committee**

In January 2009, the TUSM Executive Council approved its “Policy on Industry Conflicts of Interest” (“COI”) that outlines TUSM parameters for relationships and interactions with industry (pharmaceutical, medical device and biotechnology) and applies to all TUSM faculty, administrators and students. Prior to approval, this policy was vetted through a number of internal committees and groups including the Faculty Senate, the Basic Science and Clinical Chairs, the university’s Vice Provost for Research and the university’s Legal Counsel. In April, 2010, TUSM adopted its current “Revised Policy on Industry Conflicts of Interest.” This policy includes a provision establishing a Conflicts of Interest (COI) Advisory Committee.

All individuals who hold a faculty appointment at TUSM, as well as key administrators at TUSM, are required to submit Disclosure Forms indicating relationships and interactions with Industry. These forms are reviewed by the COI administrators under the direction of the Office of the Dean or Vice Dean for Academic and Clinical Affairs and the COI Advisory Committee. Those Disclosure Forms that indicate potential conflicts of interest are reviewed by the appropriate TUSM Supervisor, Department Chair or Academic Dean and, when indicated, submitted to the COI Advisory Committee.

### **COI Advisory Committee Charge**

Working in conjunction with the TUSM Department Chairs, Academic Deans and affiliated leadership, the charge of the COI Advisory Committee is to establish COI policy at TUSM, review those Disclosure Forms identified by the COI administrators as indicating potential conflicts of interest held by faculty or key administrators and, if indicated, recommend procedures for “managing” (reducing or resolving) the conflicts. The COI Advisory Committee recommendations or stipulations shall be communicated to the individual in writing. The Office of the Dean or Vice Dean for Academic and Clinical Affairs shall be responsible for sanctions for non-compliance with this policy.

## **COI Advisory Committee Membership**

The Office of the Dean will appoint representatives from Tufts University, TUSM and each of TUSM's major affiliated hospitals to sit on the COI Advisory Committee.

## **COI Advisory Committee Operations**

The COI Advisory Committee will meet on a regular basis and when requested by the COI administrators to establish policy or review individual Disclosure Forms. The COI Advisory Committee will make recommendations as to the appropriate course of management for COI disclosures and significant COI violations. When indicated, such alleged violations of the policy shall be referred by the COI Advisory Committee to the individual's immediate Supervisor, Dean and Department Chair who shall, in conjunction with the Office of the Dean or Vice Dean for Academic and Clinical Affairs, determine what actions, if any, shall be taken. Such action may depend upon the seriousness of the violation, whether it is a first or repeat offense and whether the violator knowingly violated the TUSM COI policy. The Dean or Vice Dean shall have authority to impose sanctions.