



Once the Management Plan has been uploaded, the AVPCG will refer the plan and to the Research Conflict of Interest Review Board (RCIRB) for further review.

The RCIRB will make a recommendation to the Vice President of Research and Economic Development (VPRED).

The VPRED may accept the recommendations of the RCIRB or return the Management Plan to the RCIRB with stated concerns.

The VPRED shall be responsible for deciding whether to grant final approval of the Management Plan, at which time it will become an Approved Management Plan.

This process will be followed for requested or necessary amendments to an Approved Management Plan.

### ***Financial Conflict of Interest Disclosure and Management***

This certification must be completed by Investigator/Responsible Personnel annually and prior to submitting a proposal for external funding. Financial Conflict of Interest (FCOI) Certification is completed in [Kuali](#) as part of the [Conflicts of Interest and Commitment](#) online disclosure form.

The AVPCG will review all FCOI Certifications and, if a possible FCOI is identified, the AVPCG will notify the appropriate Unit Head.

Within 30 days of being notified by the AVPCG of a FCOI, the Unit Head is required to develop, with the assistance of the Investigator/Responsible Personnel, a Management Plan. The Unit Head may contact the AVPCG if guidance is needed in developing a Management Plan.

The Unit Head must upload the Management Plan to Kuali.

Once the Management Plan has been uploaded, the AVPCG will refer the plan and to the RCIRB.

The RCIRB will make a recommendation to the VPRED.

The VPRED may accept the recommendations of the RCIRB or return the Management Plan to the RCIRB with stated concerns.

The VPRED shall be responsible for deciding whether to grant final approval of the Management Plan, at which time it will become an Approved Management Plan.



4. Ensure written financial arrangements among affected UAH organizations are in place for portions of Investigator/Responsible Personnel salaries attributable to shared appointments/ assignments/work projects performed for the federal government or an external entity.

### ***Contracts and Purchases***

When mandated by Board Rule 106 and Alabama Code § 41-16-82, [Business Services](#) will require the submission of a Vendor Disclosure statement.  
<https://uasystem.edu/images/documents/departments/Vendor-Disclosure-Form.pdf>.

### ***Gifts, Gratuities, Benefits, Services, or Awards, etc.***

Any gift, gratuity, benefit, service, or award, etc. received by Investigator/Responsible Personnel as a result of their work for UAH should be reportable in the annual [Conflicts of Interest and Commitment online disclosure](#).

### ***Research Conflict of Interest Review Board (RCIRB)***

The VPRED will appoint a RCIRB chaired by the AVPCG.  
Initial appointments will be for 24 months.

The RCIRB will consider the nature of the research, the magnitude of the interest and the degree to which the conflict is related to the research, the extent to which the interest could be directly and substantially affected by the research, and any conflict management strategies proposed or already in place. The RCIRB may recommend a revised management plan, which may involve elimination of the conflict prior to initiating the activity and notify the VPRED of its recommendation.

The VPRED will review the recommendations of the RCIRB and make a final determination regarding the management plan. This final determination will be forwarded to the Investigator/Responsible Personnel and copied to the Unit Head. In the case of research involving human participants, a copy of the determination will be forwarded to the Institutional Review Board (IRB) as well.

The investigator must agree in writing to accept the management plan prior to initiating the research.

No individual who holds a significant financial interest in a project may participate in the review of its management strategy.

RCIRB meetings are closed to the public and documentation/records are confidential personnel records.

Any investigator may appeal the decision of the RCIRB regarding the Approved Management Plan to OVPRED

Records of all disclosures made pursuant to this procedure, OVPRED Interim Policy 07.01.03, and of any action taken to resolve, manage, or eliminate any interest disclosed under this policy shall be retained for at least three years from the submission of the final expenditures report, in the case of grants or cooperative agreements; at least three years from the final payment, in the case of research

contracts; or until the resolution of any sponsor agency action involving those records, whichever is longer.

In the event the University discovers that a failure to comply with this policy has biased the design, conduct, or reporting of the research, the University will promptly notify the sponsor of the research and describe the corrective action(s) taken or to be taken, consistent with applicable law and/or policy.

Institutional officials holding a significant financial interest in an externally sponsored research project may not participate in the solicitation, negotiation of terms and conditions, oversight of the research (unless named as a member of the research team), or management of any conflict of interest held by members of the research team.