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**Participation in Business Negotiations**. No TAMU-CC employee having a significant financial interest in a commercial or non-profit organization outside of TAMU-CC may participate in negotiating the terms and conditions of any agreement between TAMU-CC and that organization.

**Participation in Administration of Agreements**. No TAMU-CC employee having a significant financial interest or a management position in a commercial or non-profit organization outside TAMUCC may have primary responsibility for administering an agreement between TAMU-CC and that organization.

**Availability of Research Data**. All data and results arising from research in which an investigator has a significant financial interest are required to be disclosed under this policy and must be available for disinterested scientific review.

**Clinical Trial Investigators**. No one may participate as a principal investigator in a clinical trial sponsored by a start-up commercial or non-profit organization in which he or she has an equity interest, has an intellectual property interest, holds a management position or serves on the organization’s Board of Directors.

**Outside Consulting Work**. Investigators receiving compensation from a commercial or non-profit organization outside TAMU-CC must ensure that no services performed as part of outside consulting work duplicate any work they perform while participating in research. Prior approval of all outside consulting is required.

**Performance of TAMU-CC Obligations**. Investigators receiving compensation from a commercial or nonprofit organization outside TAMU-CC must ensure that no services performed as part of outside consulting are inconsistent with their TAMU-CC obligations.

**Informed Consent**. No investigator having a significant financial interest may solely obtain informed consent in research involving human subjects.

**Disclosure of Interests**. All investigators having a significant financial interest must disclose the nature of the interest in connection with scholarly publication or presentation of the results of the research. Transparency is the key to managing conflicts of interest.

**Financial Interests in Competitors and Competitive Products**. For the purposes of this policy, investigators shall be considered as having a significant financial interest if they have any interest of economic or monetary value in a business that produces a competing product that could reasonably appear to affect or to be affected by the particular research or technology transfer transaction under consideration by TAMU-CC.

**Clinical Trials of TAMU-CC Technology**. No person shall participate in a clinical trial involving technologies licensed to TAMU-CC if that person has a substantial equity interest in the licensee or intellectual property interest in the technology. When TAMU-CC has either a substantial equity interest in the licensee or an intellectual property interest in the technology, funding for the clinical trials will not be accepted without a full conflict of interest review and management plan being implemented.

**Data Production and Analysis**. Investigators having a significant financial interest shall not perform primary data analysis or production of data involving subjective scoring or similar

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methods of obtain data unless there is a clear and convincing indication that the design of the research and its analysis would provide no opportunity for bias.

**Protection of Students**. Particular attention shall be given to protecting students who could be adversely affected by the significant financial interest of an investigator or other TAMU-CC employee who has academic responsibility for the student.

**Oversight Arrangements**. In general, oversight committees or other oversight arrangements will be established in cases involving intellectual property interests, equity interests in start-up companies, student researchers and the potential for inappropriate use of state resources. Management plans should be written in lay terms, using language understandable to non-expert readers. Distancing oneself or creating a “firewall” from the interest in order to conduct the research or participate in an activity is a mechanism that may be accomplished through divestiture, constructing a divesture plan, prohibiting buying or selling of the equity while the research is ongoing. In some instances, the only realistic option may be to sever the relationship that created the potential conflict.