Instructions for Developing a Conflict of Interest Management Plan

As established in University of Hawai‘i’s Executive Policy on Conflicts of Interest (COI) and Commitment (E12.214), the University encourages its employees, where appropriate, to pursue outside activities and sponsored research that may benefit not only the University, but also the general public. However, if so doing, University employees are expected to act ethically with the utmost integrity, and avoid or manage situations where an individual’s financial, professional, or other personal interests may influence, or appear to influence, one’s judgment in fulfilling University responsibilities.

The instructions listed below are intended to assist individuals in:

- developing an appropriate COI management plan when potential conflicts are identified,
- separating University responsibilities/resources from private interests, and
- maintaining compliance with state and federal laws and regulations, and University policies and procedures.

1. Contact the Office of Research Compliance (ORC) (coi@hawaii.edu or 808-956-9596) for management plan assistance.

2. All management plans must utilize the UH COI management plan template and can be found at ORS - COI Information and ORC - Research Integrity Program.

3. If related to a proposal or award, COI disclosures must be submitted in the myGrant COI module.

4. Separate meetings/communications may be required with other Institutional offices (OGC, ORC, OTTED) as described in the management plan template. For example, OTTED should be contacted when intellectual property, patent or copyright issues require negotiation and could be included in the management plan.

5. Separate meetings/communications may also be required with other individuals involved with, and/or supporting, any of your outside interests (e.g., Attorney, Accountant, Partner, etc.). UH cannot represent your interests outside of your role/responsibilities as a University employee.

6. Senior Administrators and/or Conflicts of Interest Committee members responsible for plan oversight and/or review of the scholarly work, research, or activity must also approve and sign the plan.

7. Once signatures are obtained from all required individuals (PIs, Senior Administrators,) the original signed copies should be sent to ORC. ORC will review all COI management plans and may require revisions prior to forwarding to the Deciding Official (Vice President for Research and Innovation) for final approval.