

Conflict of Interest in Research at West Virginia University

West Virginia University (“WVU”) fosters a research environment that allows investigators to pursue important discoveries while maintaining the highest standards of research integrity. In the review and conduct of research, actions of WVU will be guided by and performed in accordance with the principles of promoting objectivity in research set forth in the Department of Health and Human Services (“DHHS”) policy and regulations [42 CFR Part 50 Subpart F](#) (also known as the “Financial Conflict of Interest (‘FCOI’) regulation”). The actions of West Virginia University will also conform to all other applicable federal, state and local laws and regulations.

The WVU Office of Research Integrity and Compliance (“ORIC”) has established Guidelines for Investigators on Conflicts of Interest in Research to:

- Provide strategies for identifying and addressing perceived, potential, and actual Conflict of Interest in Research (“COIR”);
- Provide clear guidance on responsibilities and procedures to investigators and employees to assist them in reaching decisions about the activities in which they engage, in view of their research and commitment to the University;
- Assist employees and agents with the management of potential COIR in a way that facilitates and encourages the full professional and personal development of investigators through their research, as long as their relationships with industry and their personal financial and other rewards do not adversely affect their objectivity, integrity, or professional commitment; and
- Reduce or eliminate COIR wherever possible.

The University has designated an Institutional Official who has the overall responsibility for managing COIR at WVU. The duties of the Institutional Official are as follows:

1. Be responsible for insuring all WVU research investigators are in compliance with institutional guidelines and all applicable regulations for Conflicts of Interest in Research.
2. Complete an initial review of all Disclosure of Interest in Research forms (DOIR) and determine, in his/her professional judgment, whether any further action should be taken to manage, reduce, or eliminate a potential COIR.
3. Provide reports to outside funding agencies as may be required by Federal regulations or the terms of sponsored research agreements.

In the performance of these duties, the Institutional Official has the authority to delegate such activities as may be necessary in order to fulfill these duties.

To conduct its responsibility effectively, West Virginia University maintains a Conflict of Interest in Research Committee (CIRC) to review all potential and perceived conflicts of interest in research as determined by the designated Institutional Official. The CIRC is an autonomous administrative committee established to review and manage conflicts of interest that are disclosed in research and related activities in light of federal, state, and University rules, laws, and administrative requirements.

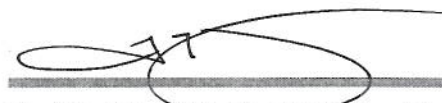
The CIRC has the following authority:

1. Provide oversight and review of research-related conflicts of interest;
2. Develop management plans to manage, reduce, or eliminate conflicts of interest that are disclosed in the conduct of research, in light of federal, state, and University rules, laws, and administrative requirements;
3. Periodically review how COIR is handled at WVU, including review of the operating procedures at WVU, and make recommendations for change, as needed; and
4. Collaborate with Office of Research Integrity and Compliance staff to ensure timely communication with faculty and compliance-related reporting.

The WVU CIRC has jurisdiction over all research conducted under the auspices of West Virginia University, regardless of funding source or performance site. Research under the auspices of West Virginia University includes research conducted at WVU, conducted by or under the direction of any employee or agent of WVU (including students) in connection with his or her institutional responsibilities, and/or conducted by or under the direction of any employee or agent of WVU using any property or facility of WVU.

All institutional and non-institutional performance sites for West Virginia University, domestic or foreign, will be obligated to conform to ethical principles which are at least equivalent to those of WVU or as may be determined by the Department of Health and Human Services (DHHS) Secretary.

The Institutional Official and the CIRC shall adopt Guidelines to manage COIR. These guidelines shall serve as the governing procedures for COIR review of all research conducted under the auspices of West Virginia University.


Fred L. King, Ph.D., Vice President for Research and
Institutional Official

West Virginia University

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