**Conflict of Interest Committee (COIC) Case Number** Click here to enter text.

# Section 1. General Information

Applicant Name Department

Click here to enter text. Click here to enter text.

Management Plan Monitor Name of Outside Entity

 Click here to enter text. Click here to enter text.

The Financial Conflict of Interest Application submitted under Name and Outside Entity above is hereby incorporated into this Management Plan.

 **The applicable actions in Sections 2-9 are the conditions that will be implemented to manage the COI and will be included in a required Annual Report.**

**Section 2. Role of Applicant and Research Management - Check all that apply**

1. [ ]  Applicant will have no involvement in related sponsored research
2. [ ]  Applicant remains as principal investigator with the Plan Monitor, in conjunction with the department head/director as applicable.
3. [ ]  Other [for COIC use] Click here to enter text.

If applicable:

1. Independent research oversight is required and the activity will be monitored by the following reviewer(s): Click here to enter text.

# Section 3. Intellectual Property and Technology Transfer

1. Applicant will disclose to the University Office of Commercialization (OC) any Intellectual Property (IP) for which he or she is named as inventor, regardless of the perceived origin of that IP. The University process will then be used to resolve IP issues.
2. The Applicant will disclose to the OC, which is represented on the COIC, any IP that is developed by any person who is an employee or student of WSU, using WSU facilities or resources, or working on the Entity side of this Management Plan.
3. ☐ Other [for COIC use]: Click here to enter text.

Any individual who is determined by OC to be an inventor, including faculty, staff, students, under patent law has a right to be named as inventor.

# Section 4. University Resources

#  University Issues and Federal Rules:

1. No university equipment, supplies, materials or animals may be transferred from the University to the Entity without appropriate contracts (i.e. a Facility Use Agreement) with the University.
2. WSU equipment can only be used if it has formally approved University Service Center external rates attached to it, or as agreed upon in a Facility Use Agreement. The annual report shall provide evidence of the approved external rates (an account statement, for example) or amounts used.
3. The use of equipment in the Laboratory must follow the priorities for “use” as set out by [2 CFR 200 (the Uniform Guidance – Subpart D, §200.313 Equipment)](https://www.ecfr.gov/cgi-bin/text-idx?SID=c762c5409aa4f861ffe0d00f374a53d0&mc=true&node=pt2.1.200&rgn=div5#se2.1.200_1313). The federal project where the equipment was funded has the highest priority and then moves down from there.

# Plan-Monitor Specific:

1. Use of Laboratory space normally under the supervision of the Applicant will be supervised by the Management Plan Monitor.
2. Management Plan Monitor shall retain fiduciary oversight for the contract (e.g. review and authorization of expenditures, appointing documents, and other fiscal and administrative tasks). Any purchases made between WSU or WSU students and the Entity shall be managed by the Management Plan Monitor.

# Applicant Specific:

1. Applicant must not promote, endorse, cite, market, advertise or offer the sale of company products or services (his/her own company or others) while serving in his/her capacity as a WSU employee. Such use of persons, money or property for private gain (commercial purposes) is a state ethics violation (RCW 42.52.160). To use WSU facilities at other times, you must fully compensate the university and have the chair, director, or dean’s written permission to use the resource for any commercial purposes.

#  Entity Use of WSU Facilities:

1. Any Outside Entity personnel, working within the approved WSU Service Center/Enterprise Account or a Facility Use Agreement, shall not disrupt normal operations or WSU’s needed use of the Facility.

Other [for COIC use]: Click here to enter text.

# Section 5. Student, Trainee and WSU Employee Involvement

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# *COI Guidance*

# Any student (undergraduate, professional, or graduate), trainee, or WSU employee who is working in any way with the Applicant’s laboratory, or is supervised or advised at all by the Applicant - regardless if they are involved with these activities or not - shall be advised of their rights and responsibilities through the *COI Guidance for Students and Employees* orientation.

# The COIC Coordinator must be contacted within 10 days if any new students, trainees, or WSU employees, are involved in the Applicants Laboratory, or are supervised or advised at all by the Applicant - regardless if they are involved with these activities or not.

# 2*. Other Student Considerations*

# Applicant may not engage students in their company’s activities if such Applicant has any evaluative authority (e.g., course grading, member of student’s graduate committee) over those students, *unless an approved COI Management plan is in place for the Applicant and the Applicant’s students.*

# Any graduate student on a Graduate Assistantship (Research, teaching or staff assistantship) shall disclose any relationships with the Outside Entity to the WSU Graduate School at gradschool@wsu.edu.

# Any graduate student who Applicant accepts to mentor for thesis research related to this case will form a graduate thesis committee within one month of starting research related to this case.

# Student graduate thesis committee meetings will be held a minimum of three times throughout the year to discuss experiments, publication strategy, and intellectual property issues.

# Faculty who have no ties to Entity will comprise a majority of a student's graduate thesis committee.

# Within one month of starting the student’s research related to this case, the Management Plan Monitor and graduate thesis committee will consult with a student regarding confidentiality agreements with the company and potential impacts on dissertation defenses. Options available for dealing with this situation can be pursued with the Attorney General's Office and may involve a non-disclosure agreement with committee members.

# Within one month of starting their research related to this case, students will meet with the Director of the OC or delegate to obtain information on IP rights.

# Delays in publication or public presentations up to, but not exceeding, 60 days will be allowed for purposes of preparing and submitting relevant patent applications.

# Students who conduct research related to this case while rotating with Applicant as part of their graduate program requirements, but who have not selected Applicant for their thesis advisor, will be treated as described in the foregoing with the exception that there will be no graduate thesis committee involvement.

# Students (as opposed to employed graduate research assistants in the research employee's lab) are not permitted to function as employees of the start-up company without obtaining prior permission from the chair/director, dean, chancellor (as appropriate), and Provost. The students must be free to pursue publication, advance in their line of study, and publish their thesis or dissertation without restriction per [WSU Executive Policy #27](http://public.wsu.edu/~forms/HTML/EPM/EP27_Ethics_Conflict_of_Interest_and_Technology_Transfer.htm).

* Other [for COIC use]: Click here to enter text.

# Section 6. Disclosures

1. All publications and presentations must include a disclosure describing the relationship with the Entity or Entities if a) the Entity or Entities supports research reported in the publication; or b) the publication or presentation is related to the Entity's or Entities' commercial interests or IP. For researchers in the biomedical sciences, disclosure in publications should conform to recent uniform disclosure guidelines published by a group of editors of major medical journals (Davidoff et al. JAMA 286: 1232-1234, 2001)
2. Applicant must notify all co-investigators on awarded grants of potential conflicts of interest.
3. Other [for COIC use]: Click here to enter text.

# Section 7. Restrictions

# Human Subjects Research. You may not participate in a clinical trial involving technology in which you have any IP interest, or involving technology licensed/optioned by the University if you have a substantial equity interest in the License or Option, without prior review and approval by our office.

# Participation in Negotiation and Administration. Neither you, or any family members, can participate in the negotiation of any University agreements related to research involving the Technology or Entity, including the licensing of IP rights arising from any such work, unless appropriate waivers are in place.

# Sharing of University Information and IP. You may not transfer any University research results or IP relating to the Technology to Entity, except through normal scholarly publication, licensing, or other agreements that are negotiated through the WSU OC or the OR. Any information being provided to Entity that was or is developed at the University, including conceptual information not yet reduced to practice, must first be disclosed to the WSU OC prior to disclosure to Entity, unless already published and available to any third party.

# Outside Work Activities. No services that you perform as part of outside consulting work for Entity may duplicate any work you perform while participating in research, and any services you provide as part of your outside consulting must be consistent with your University obligations.

# Use of University Facilities and Resources. You and all persons working with you in any University facility must take reasonable measures to ensure that no University facilities or resources are used for the private business activities or other private benefit of Entity except as may be specified under terms of official agreements between the University and Entity.

# Foreign Nationals. Foreign nationals with VISA status with the University cannot work in a start-up company as this would be a VISA violation.

# Section 8. Ongoing Compliance

1. You are required to obtain prior approval for all outside professional work and remain current in the filing of required outside work approval forms using the ANNUAL REPORT OF OUTSIDE COMPENSATION FOR FACULTY Form, found at [BPPM 60.44](https://policies.wsu.edu/prf/index/manuals/business-policies-and-procedures-manual/bppm-60-44/).
2. You are required to disclose the occurrence of any reimbursed or sponsored travel as outlined in [WSU Executive Policy #27](http://public.wsu.edu/~forms/HTML/EPM/EP27_Ethics_Conflict_of_Interest_and_Technology_Transfer.htm).
3. If the Entity will be involved with a Clinical Trial that has not yet started, you will ensure that a disclosure informing subjects of the COI will be included in the IRB approved Informed Consent Form, which will be reviewed with the rest of the protocol by the IRB. Once the Informed Consent Form has been stamped Approved, you must submit a copy of it to the COI Coordinator to be included with the case file.
4. You are required to complete [COI training](https://myresearch.wsu.edu/Training/OldAvailableTraining.aspx?action=viewsite&siteid=1185) on a recurring basis, as required per [WSU Executive Policy #27](http://public.wsu.edu/~forms/HTML/EPM/EP27_Ethics_Conflict_of_Interest_and_Technology_Transfer.htm).
5. Any COI that arises during the course of a research project, and/or involving any other Research Employee, must be disclosed within 30 days as required per [WSU Executive Policy #27](http://public.wsu.edu/~forms/HTML/EPM/EP27_Ethics_Conflict_of_Interest_and_Technology_Transfer.htm).

# Section 9. Amendments

WSU reserves the right to modify this management plan and to impose new or additional conditions. Such modifications, conditions, and additional terms will be effective immediately and incorporated into this management plan. WSU will notify you of these changes in advance via email. You will be deemed to have accepted these terms and conditions unless you appeal your management plan, which must be done in writing and sent to WSU’s Conflict of Interest Committee at or.coi@wsu.edu.

# Section 10. Applicant Certification – Signature Required

I will be fully responsible for meeting the requirements of this Management Plan, including all applicable training, compliance, and deadline requirements listed above.

Applicant Signature: \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_