

PROCESS FOR MANAGING RELATIONSHIPS IN RESEARCH

When, on a USF System Research project, a USF Investigator employs another USF Investigator who meets the definition of Related Person per USF System Policy 0-309, the following procedure must be followed:

1. At proposal:
 - a. The Principal Investigator must disclose the relationship to the University on the Internal Form.
 - b. Each of the Related Persons must write a Mitigation Memorandum:
 - i. The Mitigation Memo must name an independent investigator who will oversee administrative and financial matters involving the related investigators (e.g. performance reviews, approval of travel, approval of expense reports). If no such person is available, the Memo should name the department chair(s) who will perform this function.
 - ii. The Mitigation Memo must be signed by the appropriate persons:
 1. For USF Health faculty members, the Memo must be signed by the related persons' department chair(s) and the Senior Vice President for USF Health.
 2. For all other USF faculty/staff, the Memo must be signed by the related persons' department chair(s) and Dean or Associate Dean for Research (as appropriate). The Dean will provide a copy of the memo to the Provost.
 - iii. Once signed, the Mitigation Memo must be forwarded to the COI Program Manager for review.
2. At funding/Notice of Award:
 - a. The COI Program Manager must be contacted *before* any funding can be disbursed.
 - b. The Related Persons must provide notice to the funding agency disclosing their relationship and indicating that the potential conflict will be managed in accordance with the University's policies and procedures (if such notice was not previously provided with the proposal submission).
 - c. The COI Program Manager will contact each Related Person named on the proposal and ask them to log in to ARC and complete a Project-Specific Conflict of Interest Disclosure.

- i. As part of this disclosure, each Related Person must upload a copy of their signed Mitigation Memo into ARC as well as a copy of the project protocol.
- d. The COI Program Manager will review the Related Persons' COI Disclosures and evaluate the potential for the relationship to introduce bias into the research project. The COI Program Manager will consider the specific research project, the role of the Related Persons on the project, the type and amount of work done by each Related Person on the project and any individual financial conflicts of interest and either:
 - i. Issue administrative approval; or
 - ii. Draft a Proposed Management Plan and present it to the full Conflict of Interest Committee for review. The Committee may approve, approve pending modifications or defer the Proposed Management Plan.
- e. If a Management Plan to avoid research bias has been preliminarily approved by the COI Committee, the COI Program Manager will attach the Plan to the related Mitigation Memo and forward the document to a designated administrator in the Provost's office for final signature/approval pursuant to USF System Regulation 10.107.
- f. If the Final Management Plan has been signed by the Provost's office, the COI Program Manager will upload the signed copy into ARC and funds can be disbursed.

Revised: January 23, 2018