The following is an explanation of the Conflict of Interest Management Plan (a “Plan”) issued by the CIRB. This is NOT the Plan; the Plan is in table format and consists of information relating to your financial interests and research projects.

1. **UAB CIRB Has Issued a Plan That Relates to You and Your Research Projects.**

   If you have received a notice that you have a CIRB Management Plan, the CIRB has determined that one or more of your disclosed financial interest(s) relating to your institutional responsibilities at UAB is/are a financial conflict of interest (a “fCOI”) that UAB is required to manage. The Plan is effective three (3) business days after being issued by the CIRB Office and will remain in effect until it is withdrawn by the CIRB Office. The CIRB will review the Plan (i) periodically, (ii) as you disclose new financial interests to UAB and (iii) when you become involved as a key/responsible person in a project that is processed by the Office of Sponsored Programs (“OSP”) or is reviewed by the Institutional Review Board (“IRB”). The CIRB will amend the plan, as appropriate, and you will be notified by the CIRB when this occurs.

   You can review your Plan at any time by accessing your case (record) in the External Interests module of the Integrated Research Administration Portal (IRAP). Information and instructions for using IRAP are available at [http://www.uab.edu/era/Pages/Home.aspx](http://www.uab.edu/era/Pages/Home.aspx).

2. **Your Responsibilities.**

   You should review your Plan immediately upon receiving notification from the CIRB Office that a Plan has been issued or amended. If you find any inaccuracies in your Plan, contact the CIRB Office. You should also periodically review your Plan to familiarize yourself with its management requirements and to ensure that the information is accurate and up to date.

   You are required to comply with the requirements of the Plan. Non-compliance will be referred to the CIRB and the University Compliance Officer and may result in disciplinary action being taken. In addition to any CIRB requirements listed in the Plan, you are responsible for complying with all requirements of your school or the Provost regarding disclosure and approval of external activities and any requirements of the IRB for disclosure in consent forms.

   In accordance with the UAB Enterprise Conflict of Interest and Conflict of Commitment Policy and federal regulations, you are required to disclose to UAB any financial interest relating to your institutional responsibilities received or acquired by you, your spouse or your dependents. This disclosure is required within thirty (30) days of receipt or acquisition of the financial interest. In addition, UAB policy requires you to obtain permission before you engage in external activities. With respect to both requirements, use the Request for External Activity or Disclosure of Potential Conflict of Interest Form.

3. **Appeals.**

   If you disagree with the applicability of management elements A- G contained in your Plan, you should appeal to the CIRB for a review of its decision. The decision of the CIRB shall be final.
GUIDE TO THE MANAGEMENT REQUIREMENTS IN THE PLAN

The Plan shows your financial interests that meet the threshold for monitoring (top ordinate of the table), and all research projects with which you are associated as a key/responsible person. With respect to each project, the Plan shows financial interests the CIRB has determined that are fCOI’s which require management. Each management element applicable to a specific research project is represented by an assigned letter: A-G. A short explanation of each management element is found on the bottom of the Plan itself and in more detail below.

A. TRANSPARENCY IN RESEARCH.

UAB’s Responsibilities.

Disclosure of Your fCOI’s to Others Involved with Your Projects. All financial interests disclosed to UAB will be published by UAB on its public website. The website is available at www.uab.edu/cirb. UAB employees, trainees and sub-awardees will be informed that this information regarding financial conflicts is available on UAB’s website. However, you are encouraged to remind UAB employees, graduate students, post doctoral fellows, clinical resident fellows and collaborators (co-investigators, other researchers and individuals responsible for quality assurance, data management or data analysis) working with you on any affected projects to review the information on the UAB website as it relates to your fCOI’s.

Your Responsibilities.

Publications and Presentations. You must disclose the existence and nature of your fCOIs in all publications and presentations which refer to or include data arising from research projects listed on your Plan which have the letter A listed as an compliance element. This includes the following:

- all presentations to UAB, including the UAB Reporter;
- all external media outlets, print, broadcast media such as radio, television, internet or other electronic or online outlets;
- all speaking engagements; and
- all informal or formal written formats, including books and journals.

This disclosure requirement applies to any reference you make to a research project, even if the research project is no longer being managed under a Plan at the time of the publication or presentation. In relation to journal and book publications, you must disclose the information to the publisher or editor who will determine if a disclosure should appear in print, in conformance with their publication policies. You should retain copies of your correspondence with the publisher/editor in which you disclosed your FCOI and any correspondence evidencing the publisher’s/editor’s decision not to publish. These records should be retained by you for at least three (3) years.

B. PREVENTING UNDUE INFLUENCE ON TRAINEES AND EMPLOYEES.

UAB’s Responsibilities.

Graduate Students, Postdoctoral Fellows and Clinical Residency Fellows. UAB will provide information to UAB graduate students, postdoctoral fellows and clinical residency fellows regarding their rights to withdraw from participation in any research project in which a UAB employee has a fCOI. In addition,
information will also be provided to the above individuals regarding their rights to contact certain UAB employees on a confidential basis if they have concerns participating in a research project in connection with which a fCOI has been identified.

**Employees.** Based on the nature of your fCOI, the CIRB may request your Department Chair, the Dean of your School, the Provost or the President (as applicable) appoint a UAB employee to act as an independent counselor to review the job performance evaluations and advancement recommendations of personnel you supervise who are also involved in the applicable research project.

C. **MAY NOT SERVE AS PRINCIPAL INVESTIGATOR.**

D. **MAY NOT ENROLL STUDY SUBJECTS OR PROVIDE PROTOCOL-RELATED CLINICAL CARE.**

You are prohibited from enrolling study subjects (undertaking the assessment of inclusion and exclusion criteria for study eligibility) or providing protocol-related clinical care. You may, however, refer patients who may wish to participate in the study to approved clinical co-investigators for evaluation.

E. **MAY NOT PARTICIPATE IN DATA MANAGEMENT OR DATA ANALYSIS.**

The CIRB must approve the arrangement for data management/analysis.

F. **REQUIREMENT FOR DATA SAFETY MONITORING PLAN OR BOARD.**

If the Institutional Review Board (IRB) requires a Data Safety Monitoring Plan or Board, a copy must be provided to the CIRB. If there is no IRB requirement, the CIRB must approve the arrangement for data safety monitoring.

G. **OTHER ELEMENTS AS MAY BE DETERMINED BY THE CIRB.**

The CIRB may require other restrictions that it deems appropriate.