

# University of Michigan Policy for the Identification and Management of Conflicts of Interest in Research, Sponsored Projects, and Technology Transfer

## I. Policy Statement

The University of Michigan (“University” or “U-M”) allows and encourages entrepreneurship and cooperative activities with companies and organizations external to the University, as well as other outside activities, relationships, and interests that enhance the missions of the University ([Regents Bylaw 5.12](#) and [U-M Faculty Handbook section 9.E](#)). These include, among other things, financial interests/investments and management positions acquired and retained by University employees, provided that those external obligations and commitments do not interfere with the University employees’ respective duties or adversely affect their judgment in carrying out University responsibilities. The overarching University policy on Conflicts of Interest (COIs) and Conflicts of Commitment (COCs) (referred to herein as “Conflicts”) is [SPG 201.65-1](#), which requires employees to provide appropriate disclosure of their outside activities, relationships, and interests. This policy assures the fair treatment of all involved in the process to identify and manage Conflicts in research, sponsored projects, and technology transfer.

The Vice President for Research and Innovation (VPRI) is the designated institutional official responsible for oversight of research, sponsored projects, and technology transfer agreements. The VPRI has established the following policy and related [procedures](#) for the identification, review, and management, as needed, of Conflicts related to research, sponsored agreements, and for the protection of University intellectual property, which include:

1. Requiring disclosure of outside activities, relationships, interests, intellectual property, and investments held by employees or their spouse, domestic partner, and/or dependent children.
2. Institutional review of any potential for such outside activities, relationships, and interests to:
  - a. Compromise the integrity or objectivity of research, sponsored projects, or technology transfer agreements;
  - b. Bias the design, conduct, or reporting of research; or

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- c. Undermine the employees' obligations to the University, sponsor, research subjects, colleagues, trainees, or students.
3. Management or elimination of those activities, relationships, and interests deemed to constitute a Conflict.

If the Conflict cannot be satisfactorily managed with appropriate administrative oversight, the research, sponsored project, or technology transfer agreement may be amended to eliminate the Conflict or may not be accepted.

The University complies with [sponsor-specific COI regulations and guidance](#) for proposed and funded projects including, but not limited to, the National Science Foundation (NSF), the Department of Energy (DOE), and the National Aeronautics and Space Administration (NASA). As an addendum to this policy, U-M also has a [Public Health Service \(PHS\)-Specific Financial Conflict of Interest Policy](#) that applies to the National Institutes of Health (NIH) and other funding organizations that have implemented the PHS policy at [42 CFR Part 50 Subpart F](#).

Further, [State law](#) requires approval by the U-M Board of Regents before the University may enter into a contract (e.g., research, subcontract, sponsored agreement, technology transfer agreement, purchase agreement, etc.) with an individual who has a University appointment or with an external entity in which a University employee has certain relationships and interests.

## II. Disclosure and Review

### A. Disclosure Requirements

This policy requires the following employees to disclose outside activities, relationships, and interests in the M-Inform disclosure system:

1. All investigators listed on a proposal submission or award record for any sponsored projects;
2. Individuals named on unfunded agreements or human subjects applications who have a [related](#) outside activity, relationship, or interest;
3. Inventors of optioned or licensed U-M intellectual property; and
4. Employees upon the request of a COI office or committee.

Disclosers with active, submitted, or planned proposals for federal funding (direct or prime) who disclose an outside activity with a foreign entity must submit the original versions and English translations of all contracts, grants, appointment/acknowledgement letters, statements of work, and any other agreements with the foreign entity. This documentation **must** address the level of designated commitment, effort, and compensation related to the outside activity.

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Disclosure is required at least annually and within 30 days of a change to an existing outside activity, relationship, or interest, or engagement in new reportable outside activities, relationships, or interests (see [disclosure process](#)).

## **B. Review**

The VPRI has authorized two COI offices and corresponding committees as designated officials to review disclosed outside activities, relationships, and interests, and manage perceived or actual Conflicts related to research, sponsored projects, and technology transfer agreements.

1. The [OVPR COI Office and Committee](#) (OVPR COI) have the authority and responsibility to review and manage perceived or actual Conflicts of all University employees engaged in research with primary appointments outside of Michigan Medicine. OVPR COI Committee membership represents the diverse interests of the schools, colleges, and campuses.
2. The [Medical School Conflict of Interest Office and Board](#) (MEDCOI) have the authority and responsibility to review and manage perceived or actual Conflicts of University employees engaged in research with primary appointments in the U-M Medical School.

Review and management of a specific project or situation may be assigned to a particular office/committee with the agreement of the COI offices and/or committee chairs.

Potential Conflicts may be referred to COI offices by the Office of Research and Sponsored Projects, Innovation Partnerships, schools, colleges, academic departments, administrative units, Procurement, Real Estate Office, or others (see [initial review process](#)). Generally, potential Conflicts of Commitment will be reviewed and managed by the employee's school, college, academic department, or administrative unit, including an evaluation of scientific, budgetary, and commitment overlap. If necessary, the COI offices and committees will refer potential COCs to representatives from relevant units to be addressed.

## **C. Determinations**

When potential Conflicts involving research, sponsored agreements, technology transfer agreements, employee disclosures, etc., come to the attention of the COI offices/committees, the offices/committees may require additional information to determine whether the outside activity, relationship, or interest could directly and significantly affect the design, conduct, or reporting of the research, or the oversight of/commitment to students, trainees, and junior faculty (see [committee determination process](#)).

If a Conflict exists, the committee may (among other options) require:

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1. Management of the Conflict by a COI committee or the school, college, academic department, or administrative unit with conditions such as:
  - a. Public disclosure of the Conflict;
  - b. Monitoring of the research or research management by independent reviewers;
  - c. Restriction of the role or responsibility in the conduct of research;
  - d. Assignment of ombudspersons for students, trainees, and/or junior faculty;
  - e. Requirement of additional contractual agreements; and/or
  - f. Modification of the research plan.
2. Elimination of the Conflict through measures including but not limited to:
  - a. Disqualification from participation in all or a portion of the research;
  - b. Divestiture of the interest;
  - c. Severance of the relationship that creates the Conflict;
  - d. Withdrawal of the proposal; and/or
  - e. Suspension of the technology transfer arrangement.

## **D. Appeal**

An employee may appeal a COI committee decision in writing to the VPRI within 30 days of the date of the committee's notification of that decision. Within 30 days of receipt of a written appeal, the VPRI (or the VPRI's designee) will adjudicate the appeal. The VPRI may impose conditions on the arrangement before adjudication. If the VPRI has a Conflict related to the case, the Provost or another Executive Officer without such a Conflict will adjudicate the appeal.

The VPRI (or the VPRI's designee) will respond in writing to an appeal and notify the relevant committee of the decision and the reasons for it.

## **III. Training**

The University provides training for the disclosure of outside activities, relationships, and interests through the M-Form disclosure system. Completion of this training is a mandatory component of the annual disclosure process.

## **IV. Noncompliance**

The COI offices and committees work cooperatively with University employees and others to resolve minor noncompliance concerns.

Flagrant or repeated noncompliance (after notice) are handled through University disciplinary procedures. The University promptly reports such noncompliance to research sponsors and/or funding agencies when required, or in cases the University deems appropriate.

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False, fictitious, or fraudulent statements or claims (including intentional omissions) in violation of this policy may result in criminal, civil, administrative, or University penalties.

## **V. Governance**

This policy is owned and maintained by the VPRI. It will be reviewed and updated, as necessary, on a regular basis. The VPRI will approve the final policy and revisions.

## **VI. Resources and Contact Information/Public Accessibility**

This policy and procedures are available on the [University's Conflict of Interest website](#).

[COI Policies \(including federal sponsors such as PHS/NIH and U-M's PHS-Specific FCOI policy, NSF, DOE, NASA\)](#)

[NIH FCOI Training](#)

[Disclosure Procedures](#)

[Review Procedures](#)

[Committee Determination Procedures](#)

[Definitions and frequently asked questions](#)

Specific questions can be directed to: [COI.Support@umich.edu](mailto:COI.Support@umich.edu)

Public/external requests for PHS FCOI information must be sent to: [PHSCOIRrequest@umich.edu](mailto:PHSCOIRrequest@umich.edu)

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