CUNY Conflict of Interest Procedures for Oversight of Research by a Conflicts Overseer

The CUNY Conflict of Interest Policy requires investigators to disclose to the College Conflicts Officer at his or her college any Significant Financial Interest (as defined in the Policy) relating to the investigator’s institutional responsibilities. If the University’s Conflicts Committee determines that a Financial Conflict of Interest exists (i.e., that the Significant Financial Interest could directly and significantly affect the design, conduct, reporting, or regulatory review of the investigator’s research), the Committee may require the appointment of a Conflicts Overseer for the research project. This document outlines the requirements for the selection of a Conflicts Overseer and defines the Conflicts Overseer’s responsibilities.

1. Conflicts Overseer

(a) Selection
If the Conflicts Committee determines that a Conflicts Overseer is necessary to manage a Financial Conflict of Interest, the Committee, in consultation with the President of the college, will select a Conflicts Overseer to provide oversight of the Financial Conflict of Interest. The Conflicts Overseer may be a Department Chair, Dean, or other administrator at the college, but may not be the College Conflicts Officer. The Conflicts Overseer may not be a co-Principal Investigator or perform any similar functions for the research project to be overseen.

(b) Qualifications
The Conflicts Overseer must have the following qualifications:

(i) A broad understanding of the scope of work and expenses appropriate to the project, including relationships with subcontractors and consultants, as well as adequate knowledge of the actual or potential conflict.

(ii) Tenure, if a faculty member; or a senior administrative position

(iii) If a faculty member, rank equivalent or senior to the rank of the Principal Investigator of the project

(iv) No financial or personal interest in the project that would create an actual or potential conflict of interest.
2. **Responsibilities of Conflicts Overseer**

   (a) **Expenses**
   The Conflicts Overseer must review and approve in advance each expense of the research project in excess of $500. The Principal Investigator must submit each such proposed expense to the Conflicts Overseer in writing in sufficient detail as to explain or justify it. If necessary to manage the conflict, the Conflicts Overseer will be designated as the authorized signatory of the sponsored program account at the Research Foundation.

   (b) **Employee Oversight**
   The Conflicts Overseer must review in advance with the Principal Investigator the hiring of all individuals working on the research project and their work assignments in order to determine whether or not the hiring of any such individual represents an actual or potential conflict.

3. **Student Oversight**
   Subject to the approval of the Chief Academic Officer of the college, the College Conflicts Officer must select an independent faculty member (e.g., the Conflicts Overseer or the college's coordinator of graduate students) to meet at least once per semester with each undergraduate or graduate student or post-doctoral associate involved in the research project to assure the protection of the student's academic rights and integrity. If the independent faculty member selected is not the Conflicts Overseer, he or she must provide a written report to the Conflicts Overseer of any questionable student involvement in the project that is discovered as a result of these meetings.

4. **Monitoring of Oversight**
   The College Overseer must keep the College Conflicts Officer informed of his or her oversight activities on an ongoing basis. The College Conflicts Officer must similarly keep the Principal Investigator's Department Chair informed of the oversight of the conflict on an ongoing basis and must meet with the Chief Academic Officer of the college to review the oversight of the conflict at least once each semester.