



*University of Pennsylvania,
Penn Medicine*

**Penn Medicine
Conflict of Interest
Faculty Advisory Committee
CHARTER**

Version: May 13, 2010

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1. Introduction:

The University has long recognized the value to the institution and to the faculty of our engagement in extramural activities, as long as these activities do not adversely affect the faculty member's responsibilities to Penn Medicine. In light of the University's foremost responsibility to ensure the integrity of clinical care, education and research efforts, and to avoid conflict of interest in the conduct of these activities, the University and Penn Medicine have developed a series of conflict of interest and financial disclosure policies with which faculty are required to comply. As one component of this, Penn Medicine requires faculty to publicly disclose extramural activities online through Penn Medicine's disclosure website. This site is designed to provide information about the engagement of full-time Penn Medicine physician and/or scientist faculty with private organizations and companies for which the faculty received compensation. Because an individual's failure to properly disclose all compensated extramural activity or otherwise comply with regulations related to extramural activities may compromise the integrity of the School, Health System and University, failure to follow our conflict of interest policies may result in restrictions and/or sanctions set forth by Penn Medicine and the University. For example, during the course of evaluating the extramural reports, inconsistencies involving potential research conflicts are forwarded by Penn Medicine to the University's Conflict of Interest Standing Committee for consideration and resolution. Heretofore, inconsistencies involving repetitive non-compliance in research and all non-research extramural activities have been handled by Penn Medicine on an ad-hoc basis. This Charter of the Penn Medicine Conflict of Interest Faculty Advisory Committee (COI-FAC) explains the mission and functioning of this important committee in providing guidance and oversight of these processes.

2. Mission

The mission of the Penn Medicine Conflict of Interest Faculty Advisory Committee (COI-FAC) is four-fold: (1) To guide and oversee the Penn Medicine conflict of interest policies and practices, (2) to formally review individual cases where a Penn Medicine faculty member has allegedly failed to properly disclose extramural activity or otherwise comply with regulations related to extramural activities and to formulate a recommendation on restrictions and/or sanctions for consideration by the Dean/ Executive Vice President, (3) to provide faculty under review with a peer-based forum to directly participate in the COI-FAC evaluation process, and (4) to provide the faculty at large with an open forum for discussion of Penn Medicine conflict of interest policies.

3. Membership

Committee composition

The COI-FAC Committee will be composed of 6 - 8 University of Pennsylvania School of Medicine faculty with representation of the full spectrum of Penn's missions, and both clinical and basic sciences departments.

The Committee will be co-chaired by:

Glen N. Gaulton, Ph.D.
Executive Vice Dean and Chief Scientific Officer
Professor, Department of Pathology and Laboratory Medicine

and

Peter D. Quinn, D.M.D., M.D.
Vice Dean for Professional Services, University of Pennsylvania School of Medicine
Senior Vice President for CPUP, University of Pennsylvania Health System

Additionally, this committee will include ex officio membership from the following administrative offices: Office of General Council, Office of Corporate Alliances, Office of Faculty Affairs, Clinical Practices of the University of Pennsylvania, and the Office of the Executive Vice Dean and Chief Scientific Officer.

Selection of members

The Co-Chairs will solicit recommendations for membership as committee positions are vacated from the standing COI-FAC members and from department chairs.

a. Term of Service

Appointments to the COI-FAC will be for three years. There are no term limits for these positions.

4. Responsibilities

Representation of the faculty

The COI-FAC membership will be publicized within Penn Medicine to ensure broad awareness among the faculty and to provide a means to initiate dialogue on conflict of interest-related issues to the Committee. Committee members will represent faculty viewpoints and concerns based on their own experience and that of other non-committee faculty. The goal is to obtain input on new or current conflict of interest policies and processes so that our conflict of interest and financial disclosure approach remains relevant, cogent and compliant.

Notification and Review

The Office of Faculty Affairs and/or Office of Corporate Alliances will alert the Committee Co-Chairs of an alleged failure to report extramural activity or other violations of standing conflict of interest policies. If deemed appropriate by the Co-Chairs, the case will then be brought to the full COI-FAC for review. The administrative support offices will then develop a detailed case report for presentation to the Committee. The Committee will first conduct an overview assessment, and if further action is deemed appropriate will then meet directly with the faculty member being reviewed. Final recommendations on outcome and potential sanctions will be formulated by the Committee and forwarded by the Co-Chairs to the Dean and Executive Vice President for action.

Subcommittees

The COI-FAC may form subcommittees to further investigate specific issues or determine strategy. These subcommittees may include faculty from the COI-FAC and at large, as well as non-faculty members.

Confidentiality

Information concerning conflict of interest and financial non-compliance is to be kept strictly confidential, and not to be discussed with any individuals outside of the COI-FAC with the exception of those persons and offices involved in the non-compliance issue under discussion. In accepting COI-FAC membership, each Committee member understands and accepts this agreement of confidentiality.

Administrative Support

Administrative support to the COI-FAC is provided by the Office of the Executive Vice Dean who will guide the Office of Corporate Alliances and the Office of Faculty Affairs in support of the Committee.

5. Meeting Frequency

The frequency of Committee meetings will be correlated with the volume and weight of issues requiring COI-FAC review and input. The Committee will meet annually at minimum.