

## **MURA Annual Reviews**

No less than once per year, there shall be an annual review between the faculty/staff members with MURA approval, Department Chair/Director, Dean, their direct supervisor (if not one of the aforementioned), and representatives from the following areas:

- Office of Technology Development
- Office of Research Integrity
- Office of Research Administration
- Office of the General Counsel

These meetings will review all interactions between the company and USM, and additional representatives may be included as circumstances may warrant. Special meetings of the MURA review committee can also be held as needed.

For joint projects/programs between USM and the company, each activity should be carried out based on an agreement through the Office of Research Administration, with the approval of the Vice President for Research, following advice from General Counsel. These projects can include grants, contracts, or other agreements as the situation may require. It is important to note that such formalized relationships shall be “arm’s length” transactions between the company and USM.

**Example:**     *USM research is sponsored by the company, including personnel with interest in the company.*

The Principal Investigator (“PI”) shall not be a principal in the company. There will be an annual review of such research by the PI's supervisors up through the level of Dean/Director and the Director of the Office of Research Integrity reporting the results/recommendations of the review to the Vice President for Research. This will ensure the integrity of the research and that performance metrics have been achieved. This review will be carried out on an annual basis as part of the MURA review, or as requested either by the company, the PI or his/her supervisors.

**Example:**     *Purchase of company services or goods by USM, possibly for personnel with interest in the company.*

Purchases/contracts by USM from a MURA company cannot be initiated or executed by a person with interest in the company. Any single-source purchases must be reviewed prior to the financial transaction.

**Example:**     *Lease of USM laboratory space and other space and/or equipment by a company.*

Appropriate leases will be recommended by the Department Chair/Director/Unit Head responsible for space and/or equipment to the Vice President for Research with sign off by deans, if appropriate. Fees/contracts will be in line with those charged for use by companies not involving USM employees. The Office of General Counsel will review all leases and contracts.

**Example:**     *Company employment of individuals who are simultaneously USM graduate students.*

An ad hoc committee will be named to oversee the research and shall be notified of the potential conflict and the student's work for the dissertation or thesis shall be monitored to assure that the quality of the student's research and graduate experience is not compromised by the connection to the company. As a general rule, it is inadvisable for the student's advisor to be the student's employer or supervisor in the employee-owned company. Exceptions can be sought from the appropriate Department Chair, Dean or Director.

**Example:**     *Time commitment by employee with interest in the company.*

The initial and subsequent annual review meetings will review and consider the projected level of time commitment of employees who have an interest in the company. If there is an apparent conflict of time commitment, the employee will be required to reduce his/her involvement in the company or reduce his/her percent commitment to USM. In the case of the latter, the leave of absence or partial leave of absence will be reviewed annually until the conflict is resolved. In addition, if there are changes in the time commitments to the company, changes can be made immediately following a special meeting of the MURA review committee.

## **Remedies**

At any point in the process of reviewing disclosures, the Director of the Office of Research Integrity, the Department Chair/Director/Dean or the faculty/staff member with the interest in the company can request review by committee. The committee may advise that remedial steps should be taken to protect the interests of all parties involved and to limit the negative impact of any unavoidable conflicts of interest or conflicts of commitments.

## **Sanctions**

Disclosure is the responsibility of the faculty or staff member who becomes involved in activities that may be in conflict. Failure to disclose those relationships is a serious matter and illegal under state law.