

Management Plan

Investigator: (example)

Entity or Entities: (example)

I. Interactions with Students and Staff

UW–Madison has a duty to ensure that the entrepreneurial activities of its faculty and staff do not have a negative impact on students or research staff, especially on the academic progress of students. To fulfill this obligation, the COI Committee requires that individuals with potential conflicts of interest inform others who may be impacted by the potential conflicts.

Your relationship with the entity may not place restrictions on the ability of your students and staff to receive, analyze, or interpret data. In addition, students may not participate in research sponsored by the entity without permission from your dean's office.

The COI Committee recommends that all involvement of students and staff with the entity be conducted under formal University agreements, such as sponsored research agreements or appointments approved by your dean or director's office.

You must direct any of your students and staff with financial interests in the entity to make an annual report of outside activities using the online process (<https://research.wisc.edu/compliance-policy/outside-activities-reporting/>), if they have not already done so and regardless of whether they would normally be required to make such a report. Any of your students and staff who independently have a significant financial interest in the entity will be reviewed by the COI Committee and may be issued their own management plans.

You must notify your Dean or Director's office if you wish for the university to hire an individual who you know has a financial interest in the entity into a position over which you have a supervisory role, or if a current employee or graduate student under your supervision obtains an interest in the entity. You may not be directly involved in any final institutional decision-making regarding UW-Madison employment of any individual with a financial interest in the entity. Any such decisions must be made by an impartial party who is not under your supervision or control.

II. Contracts between University and Entity

A. Research Support from Entity

Before accepting any research support (e.g., grants, contracts, unrestricted gifts, or materials) from the entity, you must specifically disclose details of the award to your dean or director's office for approval, including the scope of the work and any award conditions. The written disclosure details must accompany a WISPER record and be routed from the department chair to the dean or director's office for approval. You must update your outside activities report and indicate that you have sponsored research.

B. Subagreements with Entity

If you anticipate engaging in a project for which the entity will be a subawardee or subcontractor, you must contact your dean or director's office for approval prior to submitting a proposal.

C. Contract Negotiation, Approval, and Signature

You may not negotiate or sign any contract with the entity on behalf of UW-Madison. In addition, any such contract's terms and budget must be approved by your Dean, Director, Division Head or their designee.

D. Invoicing, Billing, and Issue Resolution

If UW-Madison has a contractual relationship with the entity, you may not be responsible for invoicing or billing the entity, or for institutional decision-making should any issue regarding the entity's performance under the contract arise. Any such decisions must be made by an impartial party who is not under your supervision or control.

III. Purchasing

You may not be directly involved in making decisions involving the purchase of items from the entity. Any such decisions must be made by an impartial party who is not under your supervision or control, such as your department chair or someone designated by your chair. If you are a department chair, your dean should be asked to designate someone on your behalf.

IV. Use of University Facilities and Services

Any activity involving the use of University facilities or services for the benefit of the entity must be conducted in accordance with all relevant University and system policies and state and federal laws pertaining to the use of University facilities and services. Except with respect to use of facilities and services made available for general public use in accordance with established rates and conditions applicable to all users, any such activity must be approved by your Dean, Director, Division Head or their designee, and a written and approved contract is required before the activity begins. Links to relevant resources are provided in the [Conflict of Interest Policy and Procedures: Guidance Document](#).

V. Reporting of Outside Activities

You are required to submit an annual report of outside activities each spring using the online process. In addition, if you have relevant changes in your outside activities between annual reports, you must update your report within 30 days of the change. You may access your [Outside Activities Report](#) at any time during the year. For guidance on what relevant changes in your outside activities are, please see: [Conflict of Interest Policy and Procedures: Guidance Document](#)

VI. Amendments.

UW-Madison reserves the right to modify this management plan and to impose new or additional conditions. Such modifications, conditions, and additional terms will be effective immediately and incorporated into this management plan. UW-Madison will notify you of these changes in advance by sending an email message to the email account used for your annual Outside Activities Report notifications. You will be deemed to have accepted these terms and conditions unless you appeal your management plan, which must be done in writing and sent to UW-Madison's Conflict of Interest Committee via coiprogram@research.wisc.edu.

