

MEMORANDUM

To: Vice Presidents, Academic Deans and Directors and Faculty

From: C. L. Max Nikias *C. C. Nikias*  
Todd R. Dickey *Todd Dickey*

Date: November 1, 2007

Subject: Revised USC Conflict of Interest in Research policy

Last year we announced a new strategy for innovation and technology commercialization, including the launch of The USC Stevens Institute for Innovation. As we expand our efforts to support the licensing of technology and the creation of new ventures, it is just as important for USC to grow its reputation for research integrity through attention to conflicts of interest in research.

Questions about research objectivity and conflicts of interest in academia have been widely reported in the media, raising doubt about the credibility of the research that universities conduct and publish. It is essential that we demonstrate our commitment to objectivity in research if we are to maintain the public trust.

For these reasons, a group of university stakeholders comprising faculty, staff and administrators have carefully reviewed USC's Conflict of Interest in Research policy and recommended revisions to better manage relationships that create conflicts in research. Those recommendations have been incorporated in the university's revised policy. The revised policy is posted on the Office of Compliance website at <http://ooc.usc.edu/ResearchCompliance/ConflictsOfInterest/Policy.cfm>. Key features of the new policy include:

- Equity interests (stocks, options) or management roles in a research sponsor are presumed unacceptable absent compelling circumstances.
- Conflicts of interest relating to human subjects research are held to a higher level of scrutiny.
- Additional protections are provided for students involved in research.
- More guidance is given on how conflicts of interest are managed.

These changes are one reflection of our commitment to maintaining the highest standards of ethical behavior across the university. USC also is issuing a Policy Regarding Relationships with Pharmaceutical Suppliers, Biotech and Device/Medical Equipment Manufacturers and Other Healthcare Suppliers. This addresses specific conflicts and possible anti-kickback issues that can arise in certain consulting, research and other relationships between healthcare providers and suppliers such as pharmaceutical companies or medical device manufacturers.

Under the new policy, all disclosures should be made to the Office of Compliance via a streamlined disclosure statement, available online at <http://ooc.usc.edu>. If you have any questions regarding your obligations under the new policy, please contact the Office of Compliance at (213) 740-8258.

cc: Research Administrators  
Senior Business Officers