

COMMITTEE STRUCTURE AND PURVIEW**School of Medicine Committee**

This Committee reviews financial disclosures for individuals with a prime appointment* at the School of Medicine. The Committee will be comprised of at least 15 faculty members with 13 faculty representing research intensive departments and/or high conflicts of interest (COI) volume departments, the Executive Chair of the IRB, and 1 faculty IRB representative.

Danforth Campus Committee

This Committee reviews financial disclosure statements for individuals with a prime appointment* at the six schools of the Danforth campus (the Schools of Art & Architecture, Arts & Sciences, Business, Engineering, Law, and Social Work). Representation shall include faculty members from the research intensive schools, typically four from A&S (Biology, Psychology, Chemistry, Physics) three from Engineering and two from Social Work, the Executive Chair of the IRB, and the Chair of the minimal risk behavioral studies IRB.

*For individuals with a dual appointment at WU: A determination will be made by the CIRC Chairs regarding which CIRC will review the disclosure or whether a joint CIRC review will occur. As part of the Chairs' decision, consideration will be given to the extent of the involvement of the individual in collaborative projects that cross school boundaries.

Ex-officio members (for both committees)

- Director for the Office of Technology Management
- Assistant Vice Chancellor for Research Integrity and Ethics
- Office of the Vice Chancellor & General Counsel
- Vice Chancellor for Research
- Assistant Vice Chancellor for Research & Chief of Staff

Administrative Support

Office of Research Integrity and Ethics (ORIE)

APPOINTMENTS

School of Medicine CIRC: The Dean appoints the Chair, Vice-Chair, and members in consultation with the Vice Chancellor for Research (VCR).

Danforth CIRC: The Vice Chancellor for Research (VCR) appoints the Chair, Vice-Chair and members in consultation with the applicable Deans.

Criteria for all members:

- Required: senior/tenured faculty member with expertise in one or more of the following areas: entrepreneurial activities; federally funded research; Industry funded

research; human studies research; externally compensated activities, such as consulting and speaking

TERMS

Chair(s)/Vice-Chair: serves a three-year term, with the option to be re-appointed. After the Chair's term ends, s/he should continue to serve as a Committee member for a minimum of another year to be available to mentor the current Chair.

Members: Members serve three-year terms, with an option to be re-appointed. The CIRC Chair(s) may make reappointment recommendations to the Dean or VCR.

Chair and member term deviations are at the discretion of the Dean/VCR.

RESPONSIBILITIES**Committee**

The CIRC's responsibilities are defined in the Washington University's [Research Conflicts of Interest Policy](#).

Chair

The Chair is responsible for reviewing Financial Disclosure Statements. For lower risk financial conflicts of interest, the Chair may identify and develop management strategies to address the situation. In higher risk cases, the Chair will refer the matter to a subcommittee or the full committee for review.

The Chair is expected to keep abreast of evolving issues relating to conflicts of interest and to lead Committee discussions of these issues and their influence on the University and the Committee processes. The Chair should also maintain communication with the ORIE office, other related University offices and officials, relevant oversight committees, and be prepared to discuss and educate regarding financial conflicts of interest in various University settings.

Vice-Chair

The Vice-Chair is responsible for fulfilling the same duties as the Chair as necessary or when the current Chair is unavailable or conflicted.

Members

Committee members are typically asked to review situations that present moderate to high risks related to a financial conflict of interest. The members' service on the CIRC involves attendance at approximately 6-12 meetings per year as well as reviewing materials in advance of the meetings. Members may be requested to assist in specific reviews if related to their field of expertise or attend ad-hoc sub-committee meetings if convened by the Chair/Vice-Chair.

Ex-officio members

The primary role of an ex officio member is to contribute information or expertise to the CIRC. Ex-officio members do not vote.

MEMBER EDUCATION

The Chair(s) requires all new members receive training regarding the CIRC's roles and responsibilities, which will include an overview of the CIRC, the University's COI policies and processes, and federal regulations governing COI.

APPOINTMENT PROCEDURES (FOR USE BY ORIE)**Chair/Vice Chair**

When re-appointment is an option, communication with the Dean or VCR, as appropriate, approximately 6 months prior to the ending of the Chair/Vice-Chair's term to indicate that there is an option to re-appoint the existing chair.

When a new chair or vice-chair is needed, communication with the Dean or VCR, as appropriate, recommending either the Vice-Chair or one or more of the existing CIRC members as potential options as the new Chair/Vice-Chair. This process should begin approximately 6 months prior to the ending of the Chair/Vice-Chair's term.

Members

When a member leaves the CIRC or his/her term ends, communication with the Dean or VCR, as appropriate, requesting a new member for the Committee.

School of Medicine CIRC: The Dean or designee should email the applicable department chair requesting at least two suggestions for the new members.

Danforth CIRC: the VCR or designee should e-mail the dean of the appropriate school requesting at least two suggestions for new members.

Communications:

- Invitation letter from Dean
- Letter from CIRC Chair
- Thank you letter for departing member

CIRC Information Packet:

An information packet along with a cover letter is sent to the new member, which includes (but may not be limited to) the following materials:

- Current Committee roster (updated to include the new committee member(s))
- CIRC Roles and Responsibilities
- WU Research Conflicts of Interest Policy
- DHHS Regulations on Objectivity in Research 42 C.F.R. part 50 and 45 C.F.R. Part 90
- Conflict of Interest Section from Current NIH Grants Policy Statement

- Conflict of Interest Section From Current NSF Award and Administrative Guide
- AAMC Task Force on Financial Conflicts of Interest in Clinical Research: Report on Individual Financial Interest in Human Subjects Research (December 2008)

Include other materials, pertinent articles, etc. as appropriate or as designated by CIRC Chair.

Other procedural steps:

- Update applicable roster
- Update member terms spreadsheet

Created 08/98 (for School of Medicine); Revised 1/01, 12/03, 3/30/05, 11/30/05 (created for Danforth Campus), 04/10/2007, 05/23/12, 11/10/17, 6/21/18, 08/02/19, 08/14/19