



Responsible Office: Office of Research Compliance and Assurance
Last Review Date: 7/15/2020
Next Required Review: 7/15/2025

# Conflict of Interest in Research Procedures

## 1.0 Purpose

These procedures supplement the University [Conflict of Interest in Research](#). They policy and associated procedures are derived from the Final Rules promulgated by the Public Health Service (HHS) Financial Conflict of Interest Intlgated

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## Vice President for Research and Economic Development

The Vice President for Research appoints the Designated Official and serves as the final arbiter in the appeals process. The Vice President and Designated Official shall make the determination regarding whether or not an Employee's real or potential Financial Conflict of Interest must be managed, reduced or eliminated.

Activities that warrant a reduction or elimination of a Conflict of Interest will be reviewed by the Designated Official and the Institutional Official (Vice President for Research and Economic Development) and a determination made. Activities require reduction or elimination, a plan for doing so will be developed by the Designated Official and the Investigator

### 5.1 What Must Be Disclosed

Investigators are encouraged to disclose any situation that could conceivably be viewed as a conflict of interest or a reportable financial interest. Please also refer to the [USA Conflict of Interest in Research Policy](#) for activities requiring disclosure include, but not limited to:

- 5.1.1 Ownership interest in any entity providing funds for research activities
- 5.1.2 Ownership interest in any entity that owns intellectual property that could reasonably be affected by research activities
- 5.1.3 Financial interest that could reasonably appear to be related to your institutional responsibilities (including your spouse and dependent children)
- 5.1.4 Serving on a board of directors or scientific advisory board of a business that provides financial support for University research conducted by the Investigator/Employee or a family member.
- 5.1.5 Serving in an executive position in a profit or not-for-profit business which conducts research or other activities in an area related to your University duties.
- 5.1.6 Serve as a paid/unpaid consultant for any entity providing funds for research activities
- 5.1.7 Assignment of students or trainees to University research projects sponsored by a business which you or a family member has a financial interest
- 5.1.8 Participating in University research, clinical trials, or service agreements which are funded by a grant or contract from a business which the Investigator/Employee or family members has a financial interest



[Interest Certification](#) form must be completed by the Principal Investigator. This form is submitted with the grant proposal via Sponsored Projects Administration online management system, Cayuse. The [Conflicts of Interest Certification](#) form shall be updated by the Principal Investigator any time additional individuals are identified at the time of proposal award or thereafter. The [Conflict of Interest Certification](#) form must be subsequently updated.

- Annually during the period of award for [PHS funded research or Non PHS organization](#). This requirement applies to the Investigator and

The Investigator's written notification must be acknowledged by the student or trainee. Additionally, faculty must discuss conflict of interest principles intended to guide productive engagement of students in faculty enterprises. [A sample letter of notification](#) is available on the Conflict of Interest website.

#### 5.2.4 Travel Disclosure

PHS Funded Investigators or organizations that require compliance with PHS Financial Conflict of Interest Regu(i)(ti)4 (o) wpl991tm8-2 (n)6 (fu 0.002 Tc 0.0



## 5.4 Review, Management & M



#### 5.4.2 Management Plan

If it is determined that a financial interest is related to ~~PHS~~ funded research, ~~Non~~PHS compliant agency or an external faculty enterprise, a management plan may be required to eliminate or manage the financial and/or personal conflict of interest, as appropriate. The following will occur:

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- A list of relevant research projects being pursued
- Change in status if the individual is invested in a related startup company

## 5.5 Subrecipient Compliance and Reporting

The University must apply relevant originating sponsor conflict of interest requirements to subrecipients. Thus, the University must identify whether or not a subrecipient has a conflict of interest policy compliant with applicable originating sponsor conflict of interest requirements.

The Office of Sponsored Projects Administration collects the following at time of proposal submission:

- [Documentation of Subrecipient: Financial Conflicts of Interest Policy Commitment Form](#) (See Link to Form 1)
- Additionally, if subrecipient follows the University's Conflict of Interest Policy, sub-recipient completes [Subrecipient Disclosure of Financial Interest in Research](#) (See Link to Form 2)

If the University carries out the PHS-funded research through a subrecipient, the University will incorporate as part of a written agreement with the subrecipient terms that establish whether the University's or the subrecipient's policy on conflict of interest in research will apply to the sub

5.6.1 The University must, within 120 days of its determination of

## 6.0 Enforcement

The responsible parties for oversight and enforcement are:

