

Supplemental Procedures Governing Financial Conflicts of Interest in Externally Funded Research

I. Scope

These procedures are due & for financial conflicts of interest. For all other external agencies, the institution will comply with that agency's financial conflict of interest policy to the extent the agency's policy is more stringent than these procedures.

II. Disclosures of Significant Financial Interests

Investigators must disclose any significant financial interest (refer to University Policy 54 for definition) to the Office of Research Administration (ORA) prior to the submission of their project to an external agency. This disclosure is separate from the University annual conflict of interest disclosure process. Investigators will complete the Supplemental Disclosure Form and the ORA will maintain the form, for at least three years from the date the final expenditure report is submitted to the external agency. Investigators must update the Supplemental Disclosure Form with the ORA at the following intervals:

- (a) within thirty days of discovering or acquiring (e.g. through purchase, marriage, or inheritance) any new significant financial interest; and
- (b) annually within the period of the award

III. Travel Disclosure for PHS Funded Research

Investigators or prior to the submission of their project to the external agency. The ORA will maintain the Disclosure of Reimbursed or Sponsored Travel form, in confidence, for at least three years from the date the final expenditure report is submitted to the agency. Investigators must update the Disclosure of Reimbursed or Sponsored Travel Form with the ORA at the following intervals:

- from the research proposal to an external

at four-year intervals and a certificate of completion will be

Significant Financial Interests

The Director of Sponsored Research or his/her designee, will review the disclosure form to determine whether each significant financial interest relates to the funded research. The Director will determine whether the significant financial interest could directly and significantly affect the design, conduct, or reporting of the externally funded research, thereby constituting a financial conflict of interest. If a financial conflict of interest exists, the Director will notify the researcher's Department head or direct

supervisor for further review and management of the conflict co