University Policy
University Procedure
Operating Standard

Last Revision: August 15, 2012

- stocks, stock options, or other ownership interest); and intellectual property rights (e.g. patents, copyrights and royalties from such rights).
- k) "Sponsored Travel" means any reimbursed or sponsored travel which is paid on behalf of the Investigator or his or her Family or reimbursed to the Investigator or his or her Family and which is related to the Investigator's Institutional Responsibilities.

Investigators must disclose 4d)-0-1.7cveaavornys -4.3 (a)-3.2 (n)-0.8(s)-4.4 (b)-0.8u)-0.7(o)6 (s)-4.3 a)-3.2 tge

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Where an Investigator intends to receive PHS Funding by way of a sub-award, the University may be required to submit the Financial Interest Disclosure Form to the institution making the sub-award for review and assessment of potential conflict of interest by that institution.

In instances where the disclosed Significant Financial Interest is less than \$10,000 and the potential conflict of interest can be easily managed or eliminated, the Chair of the FCOI Review Committee and the Research Services Office may elect to conduct an expedited review and render a decision. These actions shall be reported by the Chair to the FCOI Review Committee on a regular basis.

The FCOI Review Committee will review all disclosures of Significant Financial Interests forwarded by the Research Services Office to determine whetetloignificant Fin2aetertel-3 (lim)-6.3 (in)2.3 (ai)10.6 (r oe)-3 (w (ai)10.Pt)-3.00Rithin2aeC

A plan for management or elimination of the Financial Conflict of Interest may also be imposed on an Investigator by another institution as a condition of a sub-award.

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Any plan for the management or elimination of a Financial Conflict of Interest approved by the FCOI Review Committee must be in place before the Research begins. The FCOI Review Committee may decide to permit PHS grant applications to be submitted while it is considering a possible financial conflict of interest with the understanding that the University will not accept the funds unless the conflict can be managed or elim on 6.9 Ro

management plan for the duration of the PHS-funded research project. The Investigator must provide the University with any additional information necessary to complete this reporting requirement.

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The Research Services Office will retain records of all Financial Interest Disclosure Forms and records of all actions taken by the University with respect to such disclosures.

The University is required to keep Financial Interest Disclosure Forms and all other records related to disclosure, review and management of conflicts of interest for at least three years beyond the termination or completion of the grant to which they relate, or until the resolution of any action by the PHS Awarding Component involving those records, whichever is longer.

Any Investigator currently involved in Research supported by PHS funding, or intending to submit an application for any PHS funding, or at any time joining a Research project with PHS funding, must complete the on-line PHS Awarding Component Training Module

Completion of each Training Module must be evidenced by the Training Certificate, which must be submitted to the Research Services Office prior to acceptance of an award or sub-award from a PHS Awarding Component.

Training must also be completed every four years after the initial training, and immediately when any of the following circumstances apply:

- a) The University revises its financial conflict of interest policies or procedures in any manner that affects the requirements of Investigators.
- b) The University finds that an Investigator is not in compliance with the University's financial conflict of interest policy or a management plan.