

## GEORGIA STATE UNIVERSITY POLICY ON FINANCIAL DISCLOSURES IN SPONSORED PROJECTS

**Responsible University Office:** Office of Research Integrity

**Responsible University Officer:** Vice President for Research and Economic  
Development

**Corresponding Policies:** Georgia State University Policy on Individual Conflict of  
Interest and Conflict of Commitment

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### **Section I. Introduction.**

#### **A. Purpose**

Georgia State University (“**University**”) encourages its faculty and staff to participate in outside activities that serve to benefit the interests of the participants and the University. The experience and enhanced national status that such participation affords the University contribute to the richness and diversity of the academic community. The University recognizes the benefit of such participation but is also committed to high ethical standards and objectivity in the conduct of University research. The University is aware that some individuals conducting research at the University may have financial interests in entities with business interests closely related to their research. The term “**Research Financial Conflicts of Interest**” refers to situations where commercial or financial interests or activities outside of the University have the possibility (either in actuality or in appearance) of biasing the design, conduct or reporting of University research. (Other types of conflicts of interest are discussed in the University’s **Policy on Individual Conflict of Interest and Conflict of Commitment.**)

This **Policy on Financial Disclosures in Sponsored Research** (“**Policy**”) promotes objectivity in University research by establishing processes that provide a reasonable expectation that the design, conduct, and reporting of sponsored research are free from bias resulting from financial conflicts of interest of the University employee involved in the research.

## **B. Scope**

A University employee who submits a grant or contract proposal or conducts research under certain funding agencies’ grants or contracts must adhere to the applicable requirements of the funding agency and applicable state and federal requirements, including those involving the disclosure and regulation of outside activities and financial interests.

This Policy implements federal requirements pertaining to “Objectivity in Research” promulgated by the U.S. Public Health Service (“**PHS**”), which includes, but is not limited to:

- Agency for Healthcare Research and Quality (AHRQ)
- Centers for Disease Control (CDC)
- Food and Drug Administration (FDA)
- Health Resources and Services Administration (HRSA)
- National Institutes of Health (NIH)
- Office of the Assistant Secretary for Health
  - Office of Minority Health Resources Center (OMH)
  - Office of Population Affairs (OPA)
  - Office of Research on Women’s Health (OWH)
- Office of the Assistant Secretary for Preparedness and Response
  - Biomedical Advanced Research and Development Authority (BARDA)
- Substance Abuse and Mental Health Services Administration (SAMHSA)

The federal requirements are published in 42 CFR Part 50 and 45 CFR Part 94. This Policy also implements federal requirements contained in the National Science Foundation’s (“**NSF**”) “Investigator Financial Disclosure Policy.” The processes set forth in this Policy also seek to protect University employees from violating applicable state conflict of interest laws. To ensure objectivity in all aspects of sponsored University research and to create uniformity in the proposal submission process, this Policy applies to all GSU individuals who are conducting sponsored projects at the University. For more information on the applicability of this Policy to sub-recipients and consultants, see Section IV.I below.

## **Section II. Definitions.**

- A. “Conflict of Interest Committee”** has the meaning set forth in the Policy on Individual Conflict of Interest and Conflict of Commitment.
- B. “Conflict of Interest Officer”** means the Associate Vice President for Research Integrity or other designee of the Vice President for Research and Economic Development.

- C. **“Equity Interest”** means any stock, stock option, or other ownership interest, as determined through reference to public prices or other reasonable measures of fair market value.
- D. **“Financial Interest”** means anything of monetary value, whether or not the value is readily ascertainable.
- E. **“Immediate Family”** means an Investigator’s spouse and dependents.
- F. **“Investigator”** means any individual, regardless of title or position, who is responsible for the design, conduct, performance or reporting of a Sponsored Project. For clarification, “responsible for” means that the individual is capable of influencing the outcome or results of the Sponsored Project. The PI/PD is the most appropriate person to determine which individuals are considered Investigators on his or her Sponsored Project.
- G. **“Key Personnel”** means the PD/PI and any other person identified as senior/key personnel by the University in the proposal, progress report, or any other report submitted to PHS by the University.
- H. **“Management Plan”** means a plan to reduce or eliminate a Research Financial Conflict of Interest to ensure that the design, conduct or reporting of research is free from bias or the appearance of bias.
- I. **“Principal investigator” or “Project Director”** (the **“PI/PD”**) means the individual identified as the principal investigator or project director in a Sponsored Project proposal.
- J. **“Remuneration”** means any payment for services including, but not limited to, salary, consulting fees, honoraria, and paid authorship.
- K. **“Research Financial Conflicts of Interest”** means situations where commercial or financial interests or activities outside of the University have the possibility (either in actuality or in appearance) of biasing the design, conduct or reporting of University research.
- L. **“Responsible Representative”** means (i) with respect to any student, visiting faculty, or academic or research faculty or staff, the Dean of the college or his or her designee in which such Investigator conducts the majority of his or her University activities, (ii) with respect to any non-academic, professional or administrative staff, the Vice President to which such Investigator directly or indirectly reports, (iii) with respect to any Dean, the Vice President for Research and Economic Development and (iv) with respect to any Vice President or any other Investigator not covered under clauses (i) through (iii), the President of the University.

**M. “Significant Financial Interest”** means a Financial Interest consisting of one or more of the following interests of the Investigator and those of the Investigator’s Immediate Family that reasonably appears to be related to the Investigator’s University Responsibilities:

1. with regard to any publicly traded entity, any Remuneration received from such entity in the twelve (12) months preceding the disclosure and the value of any Equity Interest in such entity as of the date of disclosure that, when aggregated, exceeds \$5,000;
2. with regard to any non-publicly traded entity:
  - a. any Remuneration received from such entity in the twelve (12) months preceding the disclosure that, when aggregated, exceeds \$5,000, or
  - b. any Equity Interest regardless of value;
3. intellectual property rights (e.g., patents, copyrights), where income related to such rights and interests has been received;
4. reimbursed or sponsored travel, excluding travel that is reimbursed or sponsored by a federal, state, or local government agency, an institution of higher education, an academic teaching hospital, a medical center, or a research institute that is affiliated with a institution of higher education.

Significant Financial Interest does not include the following types of Financial Interests: (1) salary, royalties, or other Remuneration paid by the University to the Investigator if the Investigator is currently employed or otherwise appointed by the University, including intellectual property rights assigned to the Georgia State University Research Foundation and agreements to share in royalties related to such rights; (2) income from investment vehicles, such as mutual funds and retirement accounts, as long as the Investigator does not directly control the investment decisions made in these vehicles; (3) income from seminars, lectures, or teaching engagements sponsored by a federal, state, or local government agency, or an institution of higher education, an academic teaching hospital, a medical center, or a research institute that is affiliated with an institution of higher education; or (4) income from service on advisory committees or review panels for a federal, state, or local government agency, or an institution of higher education, an academic teaching hospital, a medical center, or a research institute that is affiliated with an institution of higher education.

**N. “Sponsored Project”** means an externally-sponsored instruction, research or service project.

**O. “University Responsibilities”** means an Investigator’s professional responsibilities on behalf of the University including, but not limited to, activities such as research, research consultation, teaching, professional practice, institutional committee memberships, and service on panels.

### **Section III. Application.**

In order to address potential Research Financial Conflicts of Interest, Investigators must make full disclosure of relevant information related to any Significant Financial Interest so that the appropriate parties may evaluate such information as set forth below.

### **Section IV. Research Financial Conflicts of Interest Training, Disclosure, Review and Management.**

#### **A. Training**

Each University Investigator is responsible for understanding this Policy and all applicable laws and regulations relating to Research Financial Conflicts of Interest. In addition to the annual training required by the University's **Policy on Individual Conflict of Interest and Conflict of Commitment**, each Investigator must complete training specific to Research Financial Conflicts of Interest (hereinafter referred to as the "**Training**"). Each Investigator must complete the Training prior to engaging in activities pursuant to the Sponsored Project and at least every four (4) years thereafter at the discretion of the Conflict of Interest Officer.

If an Investigator is added to a Sponsored Project after the commencement of the Sponsored Project activities, such Investigator must complete the Training prior to engaging in activities pursuant to the Sponsored Project.

For projects funded by PHS agencies, if the Sponsored Project involves a subcontract or consulting agreement for individuals outside the University to conduct a portion of the Sponsored Project, such individuals **may** have to complete the Training if they are responsible for the design, conduct, performance or reporting of the Sponsored Project. For more information on the applicability of this Policy to sub-recipients and consultants, see Section IV.I below.

#### **B. Disclosure of Significant Financial Interests**

In addition to the training described above, all University Investigators must disclose their Significant Financial Interests so that the University can determine if those interests are related to a Sponsored Project in which such Investigator is involved.

1. *Annual Disclosure.* An Investigator must complete the Disclosure of Financial Interest Form at the time the Investigator first completes the Training and thereafter during September of each year. The Disclosure of Financial Interest Form may be found on the URSA website. Each annual disclosure shall include updated information regarding any previously disclosed Significant Financial Interest (e.g., the updated value of a previously disclosed equity interest.)
2. *Proposal Development.* All applications for funding of new Sponsored Projects must be processed through the University's Office of Sponsored Programs ("**OSP**") in accordance with University policies and procedures. Pursuant to

such policies and procedures, the principal investigator or project director (the “PI/PD”) on a proposed Sponsored Project is required to submit the University’s Proposal Approval Form to OSP. Prior to the submission of the Proposal Approval Form, the PI/PD shall be responsible for ensuring that each Investigator involved in the Sponsored Project has completed the Disclosure of Significant Financial Interest Form. By signing the Proposal Approval Form, the PI/PD certifies that all Investigators involved in the PI/PD’s Sponsored Project have completed a Disclosure of Significant Financial Interest Form.

**Where required by the external sponsor,** OSP shall not submit a Sponsored Project proposal to an external sponsor unless each Investigator has completed the Disclosure of Significant Financial Interest Form and the PI/PD has provided the certification that all Significant Financial Interests have been disclosed. For clarification, OSP may proceed with proposal submission once all Disclosure of Significant Financial Interest Forms for all Investigators have been received and the PI/PD has certified that all Investigators involved in the PI/PD’s Sponsored Project have completed a Disclosure of Significant Financial Interest Form.

3. *Previously Undisclosed Significant Financial Interests.* Whenever an Investigator discovers or acquires a new Significant Financial Interest, he or she must complete a Disclosure of Significant Financial Interest Form within thirty (30) days of discovering or acquiring the new Significant Financial Interest.
4. *New Investigators Added to an Ongoing Sponsored Project.* When an Investigator is added to an ongoing Sponsored Project, he or she must complete a Disclosure of Significant Financial Interest Form.

### **C. Review of Significant Financial Interests by Conflict of Interest Officer**

The Conflict of Interest Officer shall review all disclosed Significant Financial Interests to determine whether or not a Significant Financial Interest relates to a proposed Sponsored Project and whether or not it would be considered a Research Financial Conflict of Interest. The Conflict of Interest Officer may contact the Investigator to request additional information he or she deems necessary to evaluate the Significant Financial Interest, and any failure by the Investigator to respond to such requests will delay the activation and expenditures of the Sponsored Project funds.

When the Conflict of Interest Officer has made a determination as to whether or not a Significant Financial Interest creates a Research Financial Conflict of Interest with regard to the Sponsored Project, he or she shall notify OSP.

When required by the sponsor, OSP shall certify in each application for funding for Sponsored Projects, in the manner specified by the sponsor, that the University:

1. has in effect an up-to-date, written, and enforced administrative process to identify and manage Research Financial Conflicts of Interest;

2. shall promote and enforce Investigator compliance with all applicable laws and regulations regarding Significant Financial Interests;
3. shall manage Research Financial Conflicts of Interest and provide initial and ongoing reports to the sponsor regarding such; and
4. agrees to make information available to the sponsor, upon the sponsor's request, relating to any Investigator disclosure of Significant Financial Interests and the University's review of, or response to, such disclosure, whether or not the disclosure resulted in a determination of a Research Financial Conflict of Interest.

If the Conflict of Interest Officer determines that a Significant Financial Interest creates a Research Financial Conflict of Interest, the University shall not allow expenditures of Sponsored Project funds from a sponsor until a Management Plan is implemented. In addition, for PHS funded projects, OSP must provide the PHS sponsor with a COI Report (defined below).

#### **D. Development of Management Plan**

If the Conflict of Interest Officer determines that the Significant Financial Interest relates to the proposed Sponsored Project, and creates a Research Financial Conflict of Interest, he or she shall, in consultation with the Investigator and University Attorney (or his/her designee), develop a Management Plan.

At a minimum, a Management Plan shall contain:

1. a description of the Significant Financial Interest and how it creates a Research Financial Conflict of Interest;
2. the role and function of the conflicted Investigator in the Sponsored Project;
3. the rationale for including the conflicted Investigator in the Sponsored Project;
4. the conditions of the Management Plan;
5. how the Management Plan will safeguard objectivity in the Sponsored Project; and
6. confirmation of the Investigator's agreement to the Management Plan.

Examples of conditions or restrictions that might be imposed in a Management Plan include:

1. public disclosure of Significant Financial Interests including disclosure in informed consent documents, on abstracts and posters submitted for presentation, and on manuscripts submitted for publication;
2. disclosures to sponsors, collaborators, human subjects or students;
3. monitoring of research activities by independent reviewers;
4. modification of the research activity plan;

5. disqualification of an individual from participation in the portion of the externally funded activity that would be affected by that individual's Significant Financial Interest;
6. divestiture of an individual's Significant Financial Interest;
7. relinquishment or reassignment of duties that could exacerbate the conflict;
8. severance of relationships or holdings that create conflicts; and/or
9. placement of holdings in a blind trust for a specific period of time.

#### **E. Review by Conflict of Interest Committee and Approval of Management Plan**

The Conflict of Interest Officer shall submit each proposed Management Plan to the Conflict of Interest Committee for its review and approval in a timely manner. The Conflict of Interest Committee may contact the Investigator to request additional information it deems necessary to evaluate the Management Plan, and any failure by the Investigator to comply with such requests within three (3) business days will be considered a violation of this Policy.

In certain cases, a potential Research Financial Conflict of Interest may require correction or management before the Conflict of Interest Committee will have an opportunity to convene and evaluate the Management Plan. In those cases, the Conflict of Interest Officer may provide provisional approval of a Management Plan until such time as the Conflict of Interest Committee can complete its review. Any Management Plan approved by the Conflict of Interest Committee or provisionally approved by the Conflict of Interest Officer will be considered an "approved" Management Plan for the purposes of this Policy.

While the Conflict of Interest Officer and Conflict of Interest Committee will seek comments to a proposed Management Plan from the Investigator and will strive to create Management Plans that are acceptable to all interested parties, the Conflict of Interest Officer and Conflict of Interest Committee will have final discretion to determine the restrictions and conditions required to ensure the University's compliance with this Policy and its obligations to sponsors and other stakeholders.

After a Management Plan has been approved, the Conflict of Interest Officer shall provide a copy of the Management Plan to the Investigator, the Responsible Representative, OSP, and if human participants are involved, the GSU IRB. Each Investigator is required to comply with any approved Management Plan relating to his or her activities, and the Management Plan shall provide that the relevant Investigators must agree in writing to abide by the Management Plan before the affected Sponsored Project may proceed.

The University shall not execute award documents or allow expenditures of research or service funds from external sponsors unless the PI/PD and each Investigator to be involved in the design, conduct or reporting of the Sponsored Project have agreed to abide by any and all conditions or restrictions imposed by the Management Plan (or alternatively, to be removed from the Sponsored Project) and the Research Financial Conflict of Interest has been disclosed to the sponsor if required by the sponsor.



## **F. Public Disclosure of Research Financial Conflicts of Interest in PHS Funded Projects**

For those Sponsored Projects funded by PHS agencies that have a managed Research Financial Conflict of Interest for a Key Personnel, the Conflict of Interest Officer shall be responsible for completing the **Public Disclosure of a Research Financial Conflict of Interest Involving Sponsored Research Form** (the “**Public Disclosure Form**”) and maintaining the Public Disclosure Form in his or her files. The Conflict of Interest Officer, or his or her designee, shall make the Public Disclosure Form available to any requesting party within five (5) business days of the request (postmark if by letter; date of transmission if by electronic means). The Conflict of Interest Officer shall be responsible for updating the information included in the Public Disclosure Form at least annually and within sixty (60) days of the receipt or identification of information concerning any additional Significant Financial Interest. However, there is no obligation to provide a requesting party with an updated Public Disclosure Form unless it is pursuant to a subsequent request.

## **G. Disclosure of Research Financial Conflicts of Interest to PHS Agencies**

The University is required to disclose specific information on Significant Financial Interests that cause Research Financial Conflicts of Interest to PHS agency sponsors prior to executing award documents or allowing expenditures of funds related to the PHS funded Sponsored Project. OSP shall be responsible for disclosing this information to the PHS agency sponsor in the manner set forth by the sponsor (such report a “**COI Report**”). In cases where a Research Financial Conflict of Interest is completely eliminated (not simply managed) prior to the expenditure of funds related to the Sponsored Project, no COI Report is required.

Additionally, during the term of the PHS funded Sponsored Project, for each Significant Financial Interest determined to be a Research Financial Conflict of Interest, the Conflict of Interest Officer shall provide OSP with an annual report (the “**Annual Report**”) that addresses the status of the Research Financial Conflict of Interest and any changes to the Management Plan. OSP shall then provide the Annual Report to the PHS agency sponsor in the manner specified by such sponsor.

## **H. Previously Undisclosed Significant Financial Interests in PHS Funded Sponsored Projects**

Whenever, during the course of an ongoing PHS funded Sponsored Project, (i) a new Investigator participating in the Sponsored Project discloses a new Significant Financial Interest as required by this Policy or (ii) an existing Investigator discloses a new Significant Financial Interest as required by this Policy, the Conflict of Interest Officer shall, within sixty (60) days, review and manage the Significant Financial Interest in the

manner set forth above. OSP shall then promptly provide a COI Report to the PHS agency sponsor regarding the new Significant Financial Interest.

Whenever, in the course of an ongoing PHS funded Sponsored Project, a Significant Financial Interest is identified that was not disclosed timely by an Investigator or, for whatever reason, was not previously reviewed by the Conflict of Interest Officer, the Conflict of Interest Officer shall, within sixty (60) days, review the Significant Financial Interest in the manner set forth above. If the Significant Financial Interest creates a Research Financial Conflict of Interest, the Conflict of Interest Officer shall implement a Management Plan in the manner set forth above and implement, at least on an interim basis, a mitigation plan which shall specify actions that have been taken to manage the Financial Conflict of Interest. In these instances where a Financial Conflict of Interest is determined, the Conflicts of Interest Officer shall, within one hundred and twenty (120) days of the disclosure, complete a retrospective review and determination as to whether the Sponsored Project was biased in the design, conduct or reporting of the research involved. The Conflict of Interest Officer must document the retrospective review and Management Plan, such documentation to include the following elements:

- Project number and title
- Contact PD/PI for the project
- Name of the individual with the Research Financial Conflict of Interest
- Name of the entity with which the individual has a Research Financial Conflict of Interest
- Reason for the retrospective review
- Detailed methodology used for the retrospective review
- Findings and conclusions of the review
- A description of the impact of any bias on the project and the University's actions to eliminate or mitigate the effect of the bias

The Conflict of Interest Officer shall provide the Management Plan regarding the new Research Financial Conflict of Interest to OSP. The Conflict of Interest Officer will provide OSP with a description of the retrospective review and whether the Sponsored Project was biased in the design, conduct or reporting of the research. OSP shall then provide the COI Report to the PHS agency sponsor in the manner specified by the sponsor.

## **I. Consultants and Sub-Recipients**

1. *Sponsored Projects not funded by PHS agencies.* Consultants and sub-recipients on Sponsored Projects not funded by a PHS agency are not subject to the training and disclosure requirements set forth in this Policy. However, OSP shall require consultants and sub-recipients of Sponsored Project funds to certify in a written agreement with the University that either (a) no Research Financial Conflict of Interest exists or (b) that any Research Financial Conflict of Interest has been disclosed to the University.
2. *Sponsored Projects funded by PHS agencies.* The GSU PI/PD on a Sponsored Project funded by a PHS agency is the most appropriate person to determine whether or not each individual involved on the Sponsored Project through a

consulting agreement or sub-recipient agreement will be responsible for the design, conduct, performance, or reporting of the Sponsored Project. Each consultant or sub-recipient that is responsible for the design, conduct, performance, or reporting of the Sponsored Project shall hereinafter be referred to as a “**Subcontractor Investigator.**”

- a. For those Subcontractor Investigators whose home institutions have a PHS-compliant conflict of interest policy, the written agreement with the University shall include a certification that the Subcontractor will comply with its own policy. The written agreement with the Subcontractor shall include:
  - i. a certification by the Subcontractor that its policy complies with all applicable laws, regulations and rules (including, but not limited to, 42 CFR Part 50 and 45 CFR Part 94); and
  - ii. time periods for the Subcontractor to report all identified Research Financial Conflicts of Interest to the University; such time periods shall be sufficient to enable the University to provide timely COI Reports, as necessary, to the PHS agency sponsor.
- b. Those Subcontractor Investigators whose home institutions do not have a PHS-compliant conflict of interest policy must abide by the following requirements:
  - i. The Subcontractor Investigator must disclose all Significant Financial Interests that are directly related to his or her work on the Sponsored Project to the University prior to proposal submission; and
  - ii. The Subcontractor Investigator must complete the University Training prior to beginning work on the Sponsored Project.

In addition, the written agreement with the Subcontractor shall state that the Subcontractor is responsible for complying with these requirements.

## **Section V. Monitoring of Management Plans.**

The Conflict of Interest Officer will have primary responsibility for monitoring the implementation and effectiveness of a Management Plan. A Management Plan may provide for the appointment of an individual or a special monitoring committee to provide direct oversight of the implementation of a Monitoring Plan, and the Conflict of Interest Officer, at his or her discretion, may appoint such additional monitors to assist with monitoring. Appointed monitors should be disinterested, free of financial or supervisory ties to the Investigator whose conflict is being monitored, and should have or have access to expertise sufficient to allow meaningful review of the conflict being monitored.

At least once a year, the Conflict of Interest Officer should complete a review of all outstanding Management Plans and provide a summary of the review to the Conflict of Interest Committee. To assist in these evaluations, Investigators may be required under their Management Plans to provide annual or other periodic reports on their compliance with the plan.

#### **Section VI. Audit.**

The Conflict of Interest Officer may conduct audits of any University activities relating to past disclosures under this Policy or any Management Plans in order to assure (1) that all relevant Research Financial Conflicts of Interest have been identified and are being managed appropriately and (2) that any systemic weaknesses in the process of Significant Financial Interest disclosure, review, approval and management at the University are identified and resolved. All Investigators shall cooperate with such audits, including requests for documentation, and failure to do so will be deemed a violation of the Policy.

#### **Section VII. IRB Review of Research Financial Conflicts of Interest**

For research involving human subjects, all Significant Financial Interest Disclosure Forms shall be shared with the University's Institutional Review Board. The IRB retains final authority over human subjects research and may decline to approve an application on grounds of Research Financial Conflict of Interest notwithstanding a decision by the Conflict of Interest Officer or the Conflict of Interest Committee that there is no Research Financial Conflict of Interest or that an identified Research Financial Conflict of Interest is capable of being managed.

#### **Section VIII. Investigation and Resolution of Policy Violations.**

Any person that becomes aware of a potential violation of this Policy should notify the Conflict of Interest Officer. Any time the Conflict of Interest Officer becomes aware of a potential violation of the Policy or of any other situation that could indicate that University activities may have been affected inappropriately by a Research Financial Conflict of Interest, the Conflict of Interest Officer shall conduct a preliminary investigation to determine whether the concerns appear to be warranted.

In consultation with the Office of Legal Affairs and Vice President for Research and Economic Development, the Conflict of Interest Officer may: investigate the matter and make a written memorandum of his or her conclusions or appoint a faculty member or a committee of faculty members to conduct an investigation and file a written report of the results of that investigation. Any such investigation should, at a minimum, include a personal interview with the person bringing the allegations or concerns and a personal interview with the Investigator, who should be informed with specificity of the allegations or concerns that have arisen. The Vice President for Research and Economic Development shall have the authority to direct that the research activities of the Investigator affected by the violation be suspended pending conclusion of an investigation.

Upon determination that a violation of this Policy has occurred or of the existence of a situation that could indicate that University research may have been affected inappropriately

by a Conflict of Interest, the Conflict of Interest Officer shall notify the Vice President for Research and Economic Development and recommend measures to ameliorate the effects of the violations, and the Vice President for Research and Economic Development shall take any steps necessary to correct the situation, including and up to disallowance of an activity previously allowed to continue under a Management Plan. In addition, when appropriate, the Vice President for Research and Economic Development shall recommend to the relevant officials the imposition of disciplinary or other action under appropriate University policies.

#### **Section IX. Appeals of Decisions Under this Policy.**

Any Investigator affected by a decision of the Conflict of Interest Officer, Vice President for Research and Economic Development or Conflict Interest Committee under this Policy concerning the management or resolution of a Conflict of Interest may appeal such decision to the Provost. Except where the Research Financial Conflict of Interest in question involves his or her actions, the Provost, either directly or through his or her designee, may review any such decision, and if the Provost determines that the decision is incorrect, inappropriate or inconsistent with this Policy or applicable law, the Provost may rescind, modify or reverse such decision or submit the decision for reconsideration by the Conflict of Interest Officer, Vice President for Research and Economic Development or Conflict Interest Committee. The Provost shall provide a written explanation of his or her decision. Any decisions by the Provost concerning such appeals shall be final, and there shall be no further right of appeal under this Policy. If the Conflict of Interest in question involves the Provost's actions, the President, either directly or through his or her designee, may review any such decision under the same conditions that the Provost would review other such decisions.

#### **Section X. Sanctions for Policy Violations.**

Possible sanctions for violation of this Policy by an Investigator may range from administrative intervention to termination of employment or enrollment, all in accordance with applicable University policies. Violations may include but are not limited to: (a) failure to comply with the disclosure and evaluation process provided under this policy (by failing to report timely a potential conflict as required, by failing or refusing to respond to requests for additional information, by providing incomplete or knowingly inaccurate information, or otherwise) and (b) failure to comply with a Management Plan.

#### **Section XI. Records Management.**

OSP and the Conflict of Interest Officer shall maintain all records relating to the disclosure and management of Significant Financial Interests under this Policy. All such documents will be retained for period of at least seven (7) years beyond the termination or completion of the Sponsored Project to which they relate or until the resolution of any action involving such records, whichever is longer.

#### **Section XII. Publication of Policy.**

The Conflict of Interest Officer shall ensure that the most recent version of this Policy is at all times accessible to the public on the University's website.

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Dates of Amendments:

October 1, 2012