



Financial Conflict of Interest in Research Policy

In Accordance with the Requirements of the Public Health Service, including the National Institutes of Health, and the National Science Foundation

POLICY

HRiA is committed to promoting objectivity in research and compliance with National Science



The term SFI does not include the following:

1. For HRiA employees, salary, royalties, or other remuneration from HRiA, including intellectual property rights assigned to HRiA 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 investor does not directly control the investment decisions made in these vehicles;
3. Income from a federal, state or local government agency,



Disclosure is the submission of the HRiA Financial Conflict of Interest Disclosure form (FCOID) by each HRiA individual who meets the definition of Investigator. The Disclosure should include the details of the nature of any SFI for the applicable Federal agency (as defined by the agency), and which is held by the Investigator, his/her spouse and/or dependent children.

For NSF and PHS proposals or awards involving an external collaborator who meets the definition of Investigator and who has an SFI, Disclosure can take one of two forms:



At the time a proposal is being prepared, the individual serving as Principal Investigator should alert any other individuals who may meet the definition of Investigator of the need to comply with these procedures. All individuals who are considered to be Investigators (including the principal investigator) are to determine and certify whether they have any SFIs and, if so, each must file Disclosure of the nature and magnitude of the financial interest, employing forms made available for this purpose by the Office of Research and Sponsored Programs. According to Federal requirements, all such Disclosures should be submitted to the Chief Financial Officer before HRiA forwards the proposal to the covered Federal funding agency. Proposals will only be processed if the appropriate Disclosures are on file.



restrictions that HRiA believes are necessary to manage the actual or potential Financial Conflict of Interest. The following are examples of conditions or restrictions that may be included in a management plan:

- public disclosure of SFIs;
- monitoring of research by independent reviewers;
- modifications to the research plan;
- disqualification from participation in all or a portion of the activity funded by the Federal agency that would impact the SFI;
- divestiture of SFIs;
- severance of relationships that create potential or actual conflicts; or
- require placing of shares or other forms of equity ownership documents in a blind trust.

Copies of the approved management plan will be made available to the Investigator and the plan must be implemented before the expenditure of funds.

For PHS-funded activities, all SFI must be reviewed by the Chief Financial Officer and all potential Financial Conflicts of Interest completely addressed prior to expenditure of funds. Should an SFI arise during the term of the award, the Investigator must file a Disclosure within 30 days and the SFI must be reviewed by the Chief Financial Officer and all potential Financial Conflicts of Interest completely addressed within 60 days of the Disclosure. If an Investigator does not file his/her Disclosure in a timely manner, additional compliance action by the Chief Financial Officer and HRiA will be required pursuant to 42 CFR 50.605.



1. prior to an Investigator's engagement in research related to any PHS funded project;
2. every four years; and
3. whenever an Investigator is found to be out of compliance with these procedures, their governing policy, or an applicable management plan.

The Principal Investigator will be responsible for identifying all investigators who should have undergone the required training prior to their engagement in the covered research.



Principal Investigator Responsibilities



Individuals who persistently or purposefully fail to adhere to these procedures and the governing policy may be subject to suspension of funds, removal from participation in the covered award and other disciplinary action as determined by the provost, subject to HRiA due process for disciplinary procedures.

Assistance

The Chief Financial Officer is available to provide advice and assistance to any individual on the interpretation of these requirements and the applicability to a specific situation.