

CONFLICT OF FINANCIAL INTEREST IN RESEARCH

PURPOSE

To promote objectivity in research by establishing standards to ensure there is no reasonable expectation that the design, conduct or reporting of research grants or cooperative agreements will be biased by any conflicting financial interest of an investigator or other senior personnel. The policy will act as an assurance of continued commitment to the integrity of the University's students, faculty, staff, and librarians in the conduct of research and other activities; and to the implementation of grants in compliance with state and federal regulations.

DEFINITIONS

1. **Conflict of Interest** - A *conflict of interest* may arise when an individual is or may be in a position to influence University business, research, or other decisions in ways that could lead to any form of personal gain for the individual or his/her family, or give improper advantage to others. A real or perceived conflict of interest may also arise when someone engages in an action or decision that compromises the integrity of teaching, research, advising, or scholarship.
2. **Family** - The *family* of a faculty member means spouse, minor children, and other persons financially dependent upon the faculty member. A relative is any person who is related by blood or marriage or whose relationship with the employee is similar to that of persons who are related by blood or marriage.
3. **Investigator** - The term *investigator* means the principal investigator, co-principal investigators, and any other person at the institution who is responsible for the design, conduct, or reporting of research or educational activities.
4. **Relationships which can give rise to conflicts of interest** - *Relationships* as used in this policy include relationships with others which can give rise to real or perceived conflicts of interest. These include, among others, personal relationships created by kinship, friendship, or professional contacts, and financial relationships created by contracts, shared property rights, or state or Federal law.

5. **Significant Financial Interest** - The term *significant financial interest* means anything of monetary value, including, but not limited to, salary or other payments for services (e.g., consulting fees or honoraria); equity interests (e.g., stocks, stock options or other ownership interests); and intellectual property rights (e.g., patents, copyrights and royalties from such rights) when related to the subject matter of the individual's research and/or scholarly activities, including teaching and advising. The term does not include:

- salary, royalties or other remuneration from the University;
- income from service on advisory committees or review panels for public or nonprofit entities;
- financial interests in business enterprises or entities if the value of such interests does not exceed **\$5,000** or does not represent more than a **5%** ownership interest for any one enterprise or entity when aggregated for the investigator and the investigator's family;
- royalties or other payments that, when aggregated for the investigator, and the investigator's family, are not expected to exceed **\$5,000** during the next twelve-month period;
- income from self-authored textbooks, software, etc. used for your teaching purposes.

A significant financial interest becomes a conflict of interest if it could result in personal gain, advantage to others to the detriment of WSU, or influence the outcomes of research.

6. **Conditions or Restrictions** - Examples of conditions or restrictions that might be imposed to manage, reduce or eliminate actual or potential conflicts of interest include:

- public disclosure of significant financial interests;
- monitoring of funded research by independent reviewers;
- modification of the funded research plan;
- disqualification from participation in the portion of the NSF-or PHS-funded research that would be affected by the significant financial interests;
- divestiture of significant financial interests; or
- severance of relationships that create actual or potential conflicts.

POLICY

To comply with this Policy, each investigator must submit a *Conflict of Financial Interest Form* (Appendix A) before:

- submission of an application to an external sponsor (private or public), or
- acceptance of any award where there was no prior disclosure submitted for that work.

Investigators required to file include those in the roles of Principal Investigator, Co-Principal Investigator, project director, and any individual who is in a significant decision-making role or who has (or, if funded, will have) signature authority for a WSU grant account.

In addition, a revised *Conflict of Financial Interest Form* must be filed whenever an investigator's significant financial interests and obligations change materially.

The *Conflict of Financial Interest Form* is a **two-part form**. All investigators must complete Part I. If an investigator's answers to Part I indicate that there may be a real or apparent conflict of interest, the investigator will also need to file Part II.

The completed *Conflict of Financial Interest Form* should accompany the proposal, ProSum Form, and budget. The *Form* should be placed in a sealed envelope, marked "Confidential," and forwarded to the Office of Grants and Sponsored Programs, Parenzo Hall, Room 103-A. The Grants Office will not submit any grant/sponsored programs application until the *Form* has been submitted; compliance with this requirement is also a prerequisite to the acceptance of any grant.

To submit a proposal for funded research to NSF and/or NIH (PHS), a principal investigator must also submit a *Conflict of Interest Certification Form* when requesting submission authorization.

The submission of the *Conflict of Financial Interest Form* and *Conflict of Interest Certification Form* satisfies the requirements of the Department of Health and Human Services (PHS & NIH) and the National Science Foundation (NSF). These agencies require that, by the time an application is submitted, each investigator planning to participate in PHS or NSF-funded research has disclosed his/her known significant financial interests (and those of his/her spouse and dependent children) (42 CFR Part 50 Subpart F and 45 CFR Part 94 and Section 510 of the NSF Grant Policy Manual).

Should a disclosure associated with any NSF or NIH (PHS) submission indicate a potential or actual conflict of interest, the Director of Grants and Sponsored Programs will advise the Vice President for Academic Affairs. The Director of Grants and Sponsored Programs will gather further information and supporting documentation from the investigator and send it to the Vice President for Academic Affairs for resolution. All such documentation and subsequent discussions will be confidential. The investigator will have an opportunity to meet with the Vice President for Academic Affairs to explain the financial documentation and to discuss possible resolutions. Should the findings indicate significant financial interest, conditions or restrictions will be imposed to effectively manage, reduce, or eliminate the conflicts. The guidelines of this policy and procedures statement will be used in the determination, including the definitions of significant financial interest and conditions or restrictions found in the *Definitions* section.

If it is determined that imposing conditions or restrictions would be either ineffective or inequitable, and that the potential negative impacts that may arise from a significant financial interest are outweighed by interests of scientific progress, technology transfer, or the public health and welfare, then the Vice President for Academic Affairs may recommend in writing that the research be permitted to go forward without imposing such conditions or restrictions. In such cases, the conflict of interest of the investigator(s) will be disclosed to the government agency as required.

The recommendation of the Vice President for Academic Affairs is final.

APPENDICES

- [Appendix A](#) - Conflict of Financial Interest Form
- [Appendix B](#) - Conflict of Interest Certification Form

Appendix A
Conflict of Financial Interest Form
Part I

All Westfield State University investigators seeking external sponsored funding to conduct scholarly activities or research are required to complete and file a signed Conflict of Financial Interest Form. Each investigator must complete this form before a proposal can be approved for submission.

Specific Instructions: Place a check in the appropriate column for each question. Once every question is answered, the investigator must certify the information by signing the bottom of the form.

Investigator's Name: _____ Department: _____

Questions	Yes	No
<i>Do you, your spouse or dependent child(ren) hold a position of management, such as board member, director, officer, partner, trustee, employee or consultant with a sponsor, a vendor or (sub) contractor related to the sponsored program activity?</i>		
<i>Do you, your spouse or dependent child(ren) have Significant Financial Interest in a Sponsor, a vendor or (sub) contractor related to your sponsored program activity?</i> <i>"Significant Financial Interest" includes stock, stock options, and/or any other ownership interest in a single entity valued at more than \$5,000 or 5% ownership.</i>		
<i>Is it reasonable to anticipate that your financial interest could be directly and significantly affected by the design, conduct, or reporting of your sponsored program activity?</i>		

If you answered "**No**" to **ALL** of the questions above, your Disclosure is complete; you do not have to submit Part II. Please sign and date the certification below.

If you answered "**Yes**" to **ANY question above**, please complete a separate Part II for **every** outside organization with which you have the relationship(s) indicated above.

Investigator Certification:

- I have read and understood the Policy on Conflict of Interest.
- I agree to file a new or updated Disclosure of Significant Financial Interests and Obligations form if the answer to any of the above questions changes.

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APPROVED: December 12, 2013

REVIEWED:

- I certify that the answers to the declaration are accurate and truthful to the best of my knowledge.

Signature of Investigator _____ Date _____

Signature of Director of Grants _____ Date _____

Conflict of Financial Interest Form Part II

Complete Part II only if you answered, "YES" to at least one of the questions in Part I.

Attach one Part II form for each organization with which you have the relationship(s) indicated in Part I.

Investigator Name: _____

Name of organization: _____

Financial relationship(s) with the organization (check all that apply):

	YES	NO
Consultant		
Employee		
Equity Interest Recipient of Honoraria		
Recipient of Royalties (Other)		

The financial relationship is between the organization and (check all that apply):

	YES	NO
Self		
Spouse		
Dependent Child(ren)		

Have you received in the last twelve (12) months, or do you expect to receive in the next twelve (12) months, payments for salary, director's fees, consulting, honoraria, royalties, or any other payments that when aggregated with payments from this organization to your spouse and/or dependent child(ren) will exceed \$5,000?

YES	NO
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5. Have you had in the last twelve (12) months or do you anticipate having in the next twelve (12) months, stock, stock options, or other equity interests in the organization which, when aggregated with those of your spouse and dependent child(ren) in this organization, have a fair market value exceeding \$5,000 or represent an ownership interest of 5% or more?

YES	NO
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6. What relationship, if any, is there between the business or activities of the organization and your current or planned areas of research?

**Appendix B
Principal Investigator Conflict of Interest Certification
for NSF or PHS (NIH) proposals**

All investigators seeking National Science Foundation (NSF) or Public Health Service (PHS/NIH) support must disclose to their colleges/universities every significant financial interest that would reasonably appear to be affected by any grant/research for which NSF or PHS funding is sought. Principal Investigators (PI) accomplish this through the filing of the

Principal Investigator Conflict of Interest Certification - Colleges/Universities must also have a written policy governing conflicts of interest which require disclosures by "each individual responsible for the design, conduct, or reporting of the research or educational activities funded or proposed for funding" by the agency. Funds may not be expended until identified conflicts have been managed or eliminated.

All three sections of this certification must be completed by the PI at the time of proposal submission. The original of this certification should be submitted with the proposal to the Grants Office. One copy should be retained with the Principal Investigator's records relating to the project.

Principal Investigator (PI): Check one of the boxes below.

Funding agency:

NSF	NIH/PHS
<input type="checkbox"/>	<input type="checkbox"/>

Title of proposal:

A current Conflict of Financial Interest and Conflict of Interest Certification Form is required for federal support and is on file with the Office of Grants and Sponsored Programs at Westfield State University. All significant financial interests related to this proposal have been disclosed.

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REVIEWED:

Are there other investigators? (check either A or B)

A.	No other individual associated with this project bear(s) responsibility for the design, conduct, or reporting of the proposed research; <i>or</i>
B.	In addition to the Principal Investigator, the following individuals may be responsible for the design, conduct, or reporting of the proposed research. I have obtained a disclosure form for each individual.

Name	Title

Forms indicating a potential conflict will be forwarded to the Vice President for Academic Affairs. All signed forms will be retained in the Grants Office for a period of 3 years following the completion of the grant.

Principal Investigator signature: _____ **Date:** _____

This signature indicates assurance by the Principal Investigator that s/he and all investigators have complied with federal and college requirements for disclosure of potential conflicts of interest relating to the grant/sponsored proposal identified above.

Grants Director: _____ **Date:** _____

VP of Academic Affairs: _____ **Date:** _____