

JACKSONVILLE STATE UNIVERSITY
Manual of Policies and Procedures

POLICY NUMBER: I:01:15

DATE: May 2013

REVISION/REVIEW DATES: November 2018

SUBJECT: Conflict of Interest Policy for Grants/Sponsored Projects

APPROVED: John M. Beehler, President

PURPOSE

Reflecting the belief of Jacksonville State University (JSU) that maintaining objectivity in research is vital and that all research must be conducted with the highest ethical standards, in a manner assuring the integrity of the research, this policy ensures a reasonable expectation that the design, conduct, or reporting of research will not be biased by any financial interest of a Principal Investigator (PI)/Project Director (PD) and/or a JSU employee whose salary is paid more than 50% from a grant/sponsored project.

POLICY

JSU has established and administers a financial disclosure policy for PIs (or PDs) and JSU employees whose salary is paid more than 50% from a grant/sponsored project ("JSU grant employee"). Designed to ensure appropriate management of actual or potential financial conflicts of interest, this policy, like the federal regulations on which it is based, promotes objectivity in research. The policy establishes standards which ensure that no reasonable expectation of bias by any conflicting financial interest of an Investigator (see 45 CFR 50.601) would occur in the design, conduct, or reporting of research funded under federal grants.

Conflict of interest is defined as conflict between public obligations and private interests of a public official. For a grant, conflict of interest occurs when the PI/PD or JSU grant employee can gain significant financial interest while supporting a grant. Also, a conflict of interest may occur when the PI/PD or JSU grant employee is in a position to influence decisions or other outcomes on behalf of one party. Such decisions or outcomes could affect one or more other parties with which the PI/PD or JSU grant employee has competing loyalties.

PIs (or PDs) or JSU employees are charged with notifying a responsible representative of Jacksonville State University if a conflict of interest arises as a result of a grant.

DEFINITIONS

Significant Financial Interest is defined as one or more of the following interests of the Principal Investigator/Project Director or JSU grant employee (and those of the PI's/PD's or JSU grant employee's spouse, domestic partner or dependent children) listed below, if the interest reasonably appears to be related to the PI's/PD's or JSU grant employee institutional responsibilities, including all research, teaching and/or service to JSU:

- With regard to any publicly traded entity, a Significant Financial Interest exists if the value of any remuneration received from the entity in the 12 months preceding the disclosure and the value of any equity interest in the entity as of the date of disclosure, when aggregated, exceeds \$5,000. Remuneration includes any salary and any payment for services not otherwise identified as salary (e.g. consulting fees, honoraria, paid authorship); equity interest includes any stock, stock option, or other ownership interest, as determined through reference to public prices or other reasonable measures of fair market value.
- With regard to any non-publicly traded entity, a Significant Financial Interest exists if the value of any remuneration received from the entity in the 12 months preceding the disclosure, when aggregated, exceeds \$5,000, or when the PI/PD or JSU grant employee (or those of the PI's/PD's or JSU grant employee's spouse, domestic partner or dependent children) owns any equity interest, regardless of dollar value.
- Intellectual property rights and interests (e.g. patents and copyrights) upon receipt of income related to such rights and interests.
- Any occurrence of any reimbursed or sponsored travel (i.e., that which is paid on behalf of the PI/PD or JSU grant employee and not reimbursed to the PI/PD or JSU grant employee), related to their Institution's responsibilities, provided however, that this disclosure requirement does not apply to 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 an Institution of higher education. PIs/PDs or JSU grant employee's must disclose the purpose of the trip, the identity of the sponsor/organizer, the destination, and the duration of the trip.

Significant Financial Interest does not include:

- Salary, royalties, or other remuneration from JSU;
- Income from seminars, lectures or teaching engagements 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 an Institution of higher education;
- Income from investment vehicles such as mutual funds or retirement accounts, as long as the PI/PD or JSU grant employee does not directly control the investment decisions made in those vehicles;
- Income from service on advisory committees or review panels for government agencies, institutions of higher education, academic teaching hospitals, medical centers, or research institutes affiliated with institutions of higher education.

PROCEDURE

Jacksonville State University chooses to proactively reduce or eliminate conflicts of interest by requiring public disclosure of significant financial interests, monitoring of research by independent reviewers, modification of the research plan, and disqualification from participation in the portion of the sponsoring agency's funded research that would be affected by significant financial interests as follows:

Principal Investigators (or Project Directors) or JSU grant employee must take the following steps when submitting research proposals:

- Complete and submit the Conflict of Interest Disclosure form (Form 101) that lists any known Significant Financial Interests when submitting any application for a research grant proposal.
- PIs/PDs or JSU grant employees with no significant financial interests to disclose must also complete the form and indicate lack of significant financial interest therein.
- Completed Conflict of Interest Disclosure forms (Form 101) must be also be submitted to the Director of University Budgets, Grants and Contract Accounting prior to submission of the applications for research grants.

- PIs/PDs or JSU grant employee must update their Conflict of Interest Disclosure form (Form 101) annually or within 30 days of obtaining a new reportable significant financial interest and submit the completed form to the Director of University Budgets, Grants and Contract Accounting.
- Except to the extent required by law and federal regulations, the information disclosed will be kept confidential.

REFERENCES:

NIH: [NIH Financial Conflict of Interest Regulation](#)

NSF: [NSF Grantee Standards](#)

[42 CFR 50, subpart f](#)

RESPONSIBILITY

Vice President for Finance and Administration is responsible for this policy.

EVALUATION

This policy will be reviewed every five (5) years by the Director of University Budgets, Grants and Contract Accounting.