

OFFICE OF FINANCE AND ADMINISTRATION

Interests must be reported with 30 days of discovering or acquiring the Significant Financial Interest.

Investigators must also disclose reimbursed or sponsored travel related to the institutional responsibilities, as defined above. Such disclosures must, at a minimum, include the purpose of the trip, the identity of the sponsor/organizer, the destination, the duration, and, if known, the monetary value. Excluded from this requirement is reimbursed travel or sponsored travel by federal, state, or local government agencies, 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.

The Vice President for Finance and Administration, or their designee will determine if any travel requires further investigation, including determination or disclosure of the monetary value.

V. Review Process

1. The Vice President for Finance and Administration, or their designee shall review all financial disclosures to determine whether a conflict of interest exists. A conflict of interest exists when the review reasonably determines that a Significant Financial Interest could directly and significantly affect the design, conduct, or reporting of the proposed sponsored project. If the Vice President for Finance and Administration, or their designee, determines that there is a potential for conflict of interest covered by this policy, then the Vice President for Finance and Administration, or their designee, and Provost will determine what conditions or restrictions, if any, should be imposed by the institution to eliminate, reduce or manage actual or potential

1. Modification of the research plan;
2. Disqualification from participation in all or a portion of the research funded;
3. Divestiture of significant financial interests; or
4. Severance of relationships that create actual or potential conflicts.

The Vice President for Finance and Administration, or their designee, or the Provost will require that a plan for reducing or eliminating conflicts of interest be incorporated into a Memo of Understanding between the University and the Investigator, providing a management plan on an on-going basis until completion of the funded research project.

To address complex situations, oversight committees may be established by the Institutional Official to periodically review the ongoing activity, to monitor the conduct of the activity (including use of students and postdoctoral appointees), to ensure open and timely dissemination of the research results, and to otherwise oversee compliance with the management plan.

VI. Violations of Conflict of Interest Policy

Whenever an Investigator has violated this policy or the terms of any resolution plan (including failure to file or knowingly filing incomplete, erroneous, or misleading disclosure forms) the Vice President for Finance and Administration, or their designee, shall notify the Provost, who will impose – or, if the violation has been discovered by the Provost, who will initiate the imposition of – sanctions or institute disciplinary proceedings against the violating individual, including suspension of all relevant activities until the matter is resolved.

In addition, the University shall follow Federal regulations regarding the notification of the sponsoring agency in the event an Investigator has failed to comply with this policy. The sponsor may take its own action as it deems appropriate, including the suspension of funding for the Investigator until the matter is resolved.

VII. Retrospective Review

In addition, if the Vice President for Finance and Administration, or their designee, determines that a Financial Conflict of Interest was not identified or managed in a timely manner, including but not limited to an Investigator's failure to disclose a Significant Financial Interest that is determined to be a Financial Conflict of Interest, or failure by an Investigator to materially comply with a management plan for a Financial Conflict of Interest, a committee appointed by the Institutional Official will complete a retrospective review of the Investigator's activities and the research project to determine whether the research conducted during the period of non-compliance was biased in the design, conduct or reporting of the research.

Documentation of the retrospective review shall include the project number, project title, PI, name of Investigator with the Financial Conflict of Interest, name of the entity with which the Investigator has the Financial Conflict of Interest, reason(s) for the

retrospective review, detailed methodology used for the retrospective review, and
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