# I. Policy

This policy governs the disclosure of individual Sgnificant Financial Interests and the management and reporting of an Individual Financial Conflict of Interest in sponsored research performed at the University of the Incarnate Word. This policy is intended to comply with federal regulations implemented by the Public Health Service (PHS) of the US Department of Health and Human Services (DHHS) and the National Science Foundation (NSF). This policy promotes objectivity in research by establishing procedures to identify and address actual and apparent financial conflicts of interest.

## II. Rationale

All employees of the University of the Incarnate Word are held to the highest standards of ethical conduct. Consistent with Section 7.2 of the University of the Incarnate Word Employee Handbook, UIW employees may not have a financial conflict of interest, direct or indirect, in any contract with UIW. Furthermore, federal regulations require investigators engaged in PHS and NSF funded research to disclose the existence of certain financial interests and require the institution to review those disclosures, determine whether any potential conflicts of interest may exist, and establish mechanisms to manage, reduce, or eliminate such conflicts of interest.

## III. Definitions

Conflict of Interest Committee (COI Committee) individual that advises the Institutional Official on Financial Conflict of Interest matters.

Entity means any domestic or foreign, public or private, organization (excluding a Federal agency) from which an Investigator (and spouse and independent children) receives remuneration or in which any person has an ownership or equity interest.

Family dent children and spouse.

Financial Conflict of Interest (FCOI) means a Significant Financial Interest that the institution reasonably determines could directly and significantly affect the design, conduct or reporting of a PHS, NSF or other applicable agency-funded project.

Institutional Official means the individual within the Institution who is responsible for the solicitation and review of disclosures of significant financial interest related to the the purposes of this policy, the Institutional

Official is the Associate Provost for Research and Graduate Education or his or her designee.

Investigator means the principal investigator, co-principal investigator, and any other person, regardless of title or position, who is responsible for the design, conduct, or reporting of research funded or proposed for funding by the NSF, PHS, or other applicable agencies. This definition may include postdoctoral associates, senior scientists, graduate students, collaborators, or consultants as appropriate. The Principal Investigator/Project Director, upon consideration of the individual s role and degree of independence in carrying out the work, will determine who is responsible for the design, conduct, or reporting of the research.

Investigator's Institutional Responsibilities

responsibilities on behalf of the institution, which may include but are not limited to research, research consultation, teaching, committee service, administration, clinical activities, or professional practice.

Significant financial interest (SFI) means:

1. With regards to

, Payments or value exceeding \$5,000 (when

In general, PHS regulations require a Financial Conflict of Interests Report include specified information sufficient to enable the awarding component to understand the nature and extent of the financial conflict and to assess the appropriateness of the management plan.

# d. Non-Compliance

Disciplinary Action: In the event of an Investiga
Policy, the Institutional Official may suspend all relevant activities or take other
disciplinary action until the matter is resolved or other action deemed
appropriate by the Institutional Official is implemented.

## An Ins

of failure to comply with this Policy, or failure to comply with the decision of the Institutional Official, will be described in a written explanation of the decision to the Investigator or the COI Committee, as applicable, and will notify the individual of the right to appeal the decision.

ii. Retrospective Review Required by PHS: In addition, if the Institutional Official determines that a Financial Conflict of Interest was not identified or managed in

The information to be made publically available shall be consistent with the