

Conflict of Interest Statement Policy for Research Activities

Seattle Pacific University

Policy:

All Seattle Pacific University faculty who receive federal support (NSF, NIMH, etc.) for their research activities must file a Conflict of Interest Statement (CIS) with the institution's Research Integrity Officer (RIO), who is appointed by the Vice President of Academic Affairs.

Investigators must submit the CIS with all required financial disclosures to the RIO at the time the proposal is submitted to the federal funding agency. These financial disclosures must be updated during the period of the award, either on an annual basis, or as new reportable significant financial interests are obtained.

The CIS will disclose all significant financial interests of the investigator (including those of the investigator's spouse and dependent children) (i) that would reasonably appear to be affected by the research or educational activities funded or proposed for federal funding; or (ii) in entities whose financial interests would reasonably appear to be affected by such activities. If no applicable financial interests exist, the CIS will consist of a statement to that effect.

Definitions:

The term *investigator* means the principal investigator, co-principal investigators/co-project directors, and any other person at the institution who is responsible for the design, conduct, or reporting of research or educational activities funded or proposed for federal funding. External subcontractors or consultants, if any, must also fill out a CIS, which the investigator is responsible to obtain.

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 interest (e.g., stocks, stock options, or other ownership interests); and intellectual property rights (e.g., patents, copyrights, and royalties from such rights).

The term does not include:

- a. salary, royalties, or other remuneration from the applicant institution;
- b. any ownership interests in the institution, if the institution is an applicant under the Small Business Innovation Research Program or Small Business Technology Transfer Program;
- c. income from seminars, lectures, or teaching engagements sponsored by public or non-profit entities;

d. income from service on advisory committees or review panels for public or nonprofit entities;

e. an equity interest that, when aggregated for the investigator and the investigator's spouse and dependent children, meets both of the following tests: does not exceed \$10,000 in value as determined through reference to public prices or other reasonable measures of fair market value, and does not represent more than a 5% ownership interest in any single entity; or

f. salary, royalties, or other payments that, when aggregated for the investigator and the investigator's spouse and dependent children, are not expected to exceed \$10,000 during the twelve-month period.

Review of CIS:

The institutional RIO will review all financial disclosures, determine whether a conflict of interest exists, and determine what conditions or restrictions, if any, should be imposed by the institution to manage, reduce, or eliminate such conflict of interest. This review will be completed within 30 calendar days of the initial filing of the CIS. A conflict of interest exists when the reviewer reasonably determines that a significant financial interest could directly and significantly affect the design, conduct, or reporting of federally funded research or educational activities.

Examples of conditions or restrictions that might be imposed to manage, reduce, or eliminate conflicts of interest include, but are not limited to:

a. public disclosure of significant financial interests;

b. monitoring of research by independent reviewers;

c. modification of the research plan;

d. disqualification from participation in the portion of the federally funded research that would be affected by significant financial interests;

e. divestiture of significant financial interests; or

f. severance of relationships that create conflicts.

If the RIO determines 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 reviewer may allow the research to go forward without imposing such conditions or restrictions.

Enforcement

Failure to submit a CIS during the initial grant application process will result in SPU withdrawing the grant application. Evidence that the CIS has been incompletely or inaccurately completed will result in an institutional investigation that follows the same procedure as outlined in the SPU Misconduct in Research or Creative Activity Policy, including the institution of sanctions where appropriate. The RIO will keep the appropriate federal office (such as the NSF's Office of the General Counsel) appropriately informed if SPU finds that it is unable to satisfactorily manage a conflict of interest.

Records

Institutions must maintain records of all financial disclosures and of all actions taken to resolve conflicts of interest for at least three years beyond the termination or completion of the grant to which they relate, or until the resolution of any NSF or other federal agency action involving those records, whichever is longer.

Reviewed by Faculty Affairs Committee, October, 2008

10/9/09