

SPRINGFIELD COLLEGE

Financial Conflict of Interest Policy for Federally Sponsored Research Projects

I. Purpose:

In accordance with Public Health Service (PHS) regulation 42 CFR Part 50, Subpart F *Responsibility of Applicants for Promoting Objectivity in Research* and consistent with the provisions of the National Science Foundation Investigator Financial Disclosure Policy (60 FR 35820), Springfield College has developed the following Financial Conflict of Interest Policy (Policy) for investigators applying to or holding grants from federal sponsors, including but not limited to, the National Institutes of Health (NIH) and the National Science Foundation.

Since the initial promulgation of the PHS regulations in 1995, the issuance of a final rule to amend the regulations was issued in the Federal Register on August 25, 2011. An institution applying for or receiving PHS funding from a grant, contract, or cooperative agreement must be in full compliance with the revised regulatory requirements. The regulation “promotes objectivity in research by establishing standards that provide a reasonable expectation that the design, conduct and reporting of research funded under NIH grants or cooperative agreements will be free from bias resulting from investigator financial conflicts of interest.” Springfield College has developed this Policy to protect the integrity of these programs and to comply with the revised federal regulations. It is the intent and policy of Springfield College as an institution of higher education in receipt of federal funds, to comply with present and future regulations. To that end, this Policy is subject to further refinements as other rules are published.

II. Scope:

This Policy applies to Springfield College investigators or project directors applying to or holding grants from federal sponsors.

III. Defined Terms

“Investigator” is defined as the project director or principal investigator and any other person, regardless of title or position, who is responsible for the design, conduct, or reporting of research funded by the grant, or proposed for such funding, which may include, for example, collaborators or consultants.

“Significant Financial Interest” is defined as:

1. A financial interest consisting of one or more of the following interests of the Investigator (and those of the Investigator’s spouse or domestic partner and dependent children) that reasonably appears to be related to the investigator’s institutional responsibilities:
 - (a) With regard to any publicly traded entity, a Significant Financial Interest exists if the value of any remuneration received from the entity in the twelve 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. For purposes of this definition, remuneration includes 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;

- (b) 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 twelve months preceding the disclosure, when aggregated, exceeds \$5,000, or when the investigator (or the investigator's spouse or domestic partner or dependent children) holds any equity interest (e.g., stock, stock option, or other ownership interest); or
- (c) Intellectual property rights and interests (e.g., patents, copyrights), upon receipt of income related to such rights and interests.

- 2. Investigators also must disclose the occurrence of any reimbursed or sponsored travel (i.e., that which is paid on behalf of the investigator and not reimbursed to the investigator so that the exact monetary value may not be readily available), related to their institutional responsibilities, provided, however, that this disclosure requirement does not apply to travel that is reimbursed or sponsored by excluded sources explained below.

A Significant Financial Interest does **not** include:

- 1. Salary royalties, or other remuneration paid by Springfield College to the investigator if the investigator is currently employed or otherwise appointed by Springfield College;
- 2. Intellectual Property Rights assigned to Springfield College and agreements to share in royalties related to such rights;
- 3. Funds and retirement accounts, as long as the investigator does not directly control the investment decisions made in these vehicles;
- 4. Income from seminars, lectures, or teaching engagements sponsored by a federal, state or local government agency, an institution of higher education as defined at 20 U.S.C. 1001(a), an academic teaching hospital, a medical center, or a research institute that is affiliated with an Institution of higher education;
- 5. Income from service on advisory committees or review panels for a federal, state or local government agency, Institution of higher education as defined at 20 U.S.C. 1001(a), an academic teaching hospital, a medical center, or a research institute that is affiliated with an Institution of higher education; or
- 6. Travel expenses that are reimbursed or sponsored by a Federal, state, or local government agency, an institution of higher education as defined at 20 U.S.C. 1001(a), an academic teaching hospital, a medical center, or a research institute that is affiliated with an Institution of higher education.

IV. College Policy & Disclosure Process:

a. Overview

Investigators submitting proposals for newly funded projects must ensure that all participants in the project who are responsible for the design, conduct, or reporting of the project submit the "Disclosure of Significant Financial Interest Form" (Disclosure Form) to the Springfield College Director of Grants and

Sponsored Research at the time of application. The Investigator will submit an updated Disclosure Form annually and within fifteen (15) days of discovering or acquiring (e.g., through purchase, marriage, or inheritance) a new Significant Financial Interest.

Individuals who come to work on an established project through reallocation of effort, hiring, transfer, promotion, etc., and thereby become responsible for the design, conduct, or reporting of the project, must submit a Disclosure Form to the Director of Grants and Sponsored Research before beginning work on the project.

1. If the individual and his/her immediate family have no Significant Financial Interests related to the project, work may begin as soon as the Disclosure Form is submitted to the Director of Grants and Sponsored Research.
2. If Significant Financial Interests exist, the individual will delay work on the project until the Associate Vice President for Academic Affairs (AVPAA) has reviewed and acted upon the information and the individual has agreed to abide by any conditions or restrictions imposed by the AVPAA.

Collaborators, subcontractors, subrecipients, and visiting scientists must either comply with this Policy or provide certification to the Director of Grants and Sponsored Research that their institution is in compliance with pertinent Federal policies and that their portion of the project is in compliance with their institutional policies. Collaborators, subcontractors, subrecipients and visiting scientists, who rely on their institution's Financial Conflict of Interest Policy must report identified conflicts of interest to Springfield College within thirty (30) days to allow Springfield College to report the conflict to the awarding agency to meet reporting requirements.

b. Disclosure of Financial Interest Statements

All Disclosure Forms and related documents are considered sensitive information and only those persons involved in the implementation of this Policy will have access to such records. Utilizing the Disclosure Form, Investigators will either certify that they and their immediate family hold no Significant Financial Interest to the Investigator's research and institutional responsibilities or indicate the existence of Significant Financial Interests and attach a full description and documentation. The Director of Grants and Sponsored Research will inform Springfield College Investigators of this requirement.

c. Review of Disclosures

The general purpose of the review process is to help the Investigator and Springfield College in avoiding threats to research or project integrity while protecting and furthering the research or project goals. Before an award is accepted, the Director of Grants and Sponsored Research will review all Disclosure Forms that indicate the existence of Significant Financial Interests. The Director will refer all Disclosure Forms that contain any Significant Financial Interests to the AVPAA.

The AVPAA will be responsible for determining whether or not an actual, potential, or apparent conflict of interest exists, i.e., whether the Significant Financial Interest of the Investigator could directly and significantly affect the design, conduct, or reporting of the funded research. The AVPAA may request

additional clarifying information from the individual and may also solicit from Investigators recommendations for conflict management plans.

If an updated Disclosure Form is submitted during the funded period of a project, the AVPAA will review the new information within thirty (30) days of receipt to determine whether the changed circumstances pose an actual or apparent conflict and to decide what, if any, modification of the conflict management plan are necessary. Continued participation by the Investigator on the project is contingent upon certification to abide by any new conditions or restrictions imposed by the AVPAA.

If an updated Disclosure Form is received during the time a proposal is pending an award decision by the federal sponsor, Springfield College will defer acceptance of the award until the AVPAA has reviewed and acted upon the new information.

d. Management Plans for Conflict

If the AVPAA determines that an actual, potential, or apparent conflict of interest exists, the AVPAA will recommend either refusal of the project or acceptance with the development and implementation of a management plan that may include, but are not limited to, the following:

1. Public disclosure of Significant Financial Interests;
2. Monitoring of the research by independent reviewers;
3. Disqualification from participation in all or part of the project;
4. Divestiture of Significant Financial Interests;
5. Severance of relationships creating conflict.

In all cases, resolution of the conflict or establishment of an acceptable management plan must be achieved within sixty (60) days of identification of a conflict of interest subsequent to Springfield College's initial report under the award. Annual updates to the management plan will be completed for the duration of the project.

e. Appeals

Appeals of the AVPAA's decision may be made to the Vice President for Academic Affairs & Provost (Provost), who will consult with the Investigator and the AVPAA and make a final determination within thirty (30) days of the submission of the appeal.

f. Enforcement

Failure to properly disclose Significant Financial Interests, or to adhere to conditions or restrictions imposed by the AVPAA, will be considered a deviation from accepted standards of conducting research projects at Springfield College.

Alleged violations of this Policy will be investigated by the AVPAA, which will make recommendations for action to the Provost. Breaches of this Policy include failure to file the necessary Disclosure Forms; knowingly filing incomplete, erroneous or misleading Disclosure Forms; violation of federal guidelines;

or failure to comply with procedures prescribed by the AVPAA. If the Provost determines that this Policy has been violated, he/she may impose sanctions including, but not limited to, notification of sponsor and termination of award; formal admonition; a letter to the Investigator's personnel file; and suspension of the privilege to apply for external funding for a period of time.

The AVPAA and Director of Grants and Sponsored Research shall, within 120 days of the AVPAA's determination of noncompliance, complete a retrospective review of the Investigator's activities and the project to determine if there was bias in the design, conduct, or reporting of such research, and shall document the retrospective review and complete a mitigation report, in accordance with PHS regulations, if bias is found.

g. Records

The Office of Academic Affairs will maintain records of all disclosures and associated activities securely and confidentially for seven (7) years following termination or compliance of the projects or resolution of any government action involving the records. A disclosure of an identified conflict of interest (and associated required updates) for a federally funded research project at Springfield College will be made publicly accessible, in accordance with the PHS regulations, via the reporting system that is required by the funding agency or by a written response to any requestor within five (5) business days of a request. The disclosure statement and associated information will not be released without notifying the Investigator.

h. Training

Each Investigator who is responsible for the design, conduct, or reporting of research activities in federally funded research projects at Springfield College must complete the approved Springfield College training program prior to engaging in research or any expenditure of any funds related to any federally funded research grant or contract and at least every four (4) years thereafter.

An Investigator shall complete the approved Springfield College training program within thirty (30) days under the following designated circumstances:

1. This Policy is changed in a manner that affects investigator requirements;
2. An Investigator is new to Springfield College or to the research project; or
3. Springfield College finds an Investigator noncompliant with this Policy or management plan.

V. Reporting Form: See attached, "Disclosure of Significant Financial Interest"

Approved by: President & President's Leadership Team
Date Adopted: June 19, 2017

Springfield College
Disclosure of Significant Financial Interest

(submitted pursuant to the requirements of the Springfield College Financial Conflict of Interest policy)

Name: _____

Reporting on activities: for the year: _____

as an addendum to my most recent report

<input type="checkbox"/> Yes	<input type="checkbox"/> No	1. Compensation (including travel expenses). Have you or a member of your Family received compensation within the last 12 months from a for-profit entity (in excess of \$5,000 or involving sponsored travel) for activities such as consulting, expert witness, advisory board membership, and the like? If yes, furnish information on an additional page and attach.
<input type="checkbox"/> Yes	<input type="checkbox"/> No	2. Equity. Do you or a member of your family own stock or hold stock options with a publicly-traded (with equity exceeding \$5,000) or privately-owned entity? If yes, furnish information on an additional page and attach (see, section C).
<input type="checkbox"/> Yes	<input type="checkbox"/> No	3. Role. Do you or a member of your family serve as a director, trustee, officer or other key employee in a for-profit corporation, partnership, business, or other entity outside of Springfield College? If yes, furnish information on an additional page and attach.
<input type="checkbox"/> Yes	<input type="checkbox"/> No	4. Intellectual Property. Do you or a member of your family have rights to and/or receive royalties from intellectual property (including, patents copyrights and trademarks but excluding academic or scholarly works) licensed to and/or owned by a for-profit entity? Do NOT include intellectual property developed in relation to your role as faculty at Springfield College. If yes, furnish information on an additional page and attach.

Certification:

I have read and understand the Springfield College Financial Conflict of Interest Policy for Federally Sponsored Research Projects and have completed this disclosure form to the best of knowledge and belief. If required, I will comply with any conditions or restrictions imposed by Springfield College to manage any real or perceived conflicts. Should my outside financial or managerial interests, or those of my family, change in a way that results in different answers to any of the questions asked in this report, I agree to submit a revision within fifteen (15) days of the change.

(Date)

(Signature)

Additional page(s) attached

Springfield College
Disclosure of Significant Financial Interest

(submitted pursuant to the requirements of the Springfield College Financial Conflict of Interest policy)

Addition to Financial Interests Report of: _____
(name / date / project, as applicable)

Reporting for: Self Family member, Name: _____
Relationship: _____

External Entity, Name: _____
Address: _____

Type of external relationship: (check all that apply)

<input type="checkbox"/>	Consultant
<input type="checkbox"/>	Speaker
<input type="checkbox"/>	Advisory Board or Committee
<input type="checkbox"/>	Equity Holdings
<input type="checkbox"/>	Governing Board or Officer
<input type="checkbox"/>	Intellectual Property Rights
<input type="checkbox"/>	Royalty Income
<input type="checkbox"/>	Other (describe below):

Amount of compensation or financial interest in reporting period: \$ _____

If travel paid by external entity: \$ _____

Destination: _____

Comments or explanatory information: