

Introduction:

South Carolina State University (SC State) is committed to its mission of teaching, research, and service. Therefore, it is imperative that activities performed in these areas by the University's faculty and staff members are done in an environment that is free of conflicts of interest.

South Carolina State University continues to expand its research opportunities and capabilities, and therefore, encourages faculty interactions with private sectors and governmental entities. Contractual agreements and grants from these entities provide an important source of funds. These contracts and grants allow the University to enhance its infrastructure, provide quality educational experiences for its faculty/staff and students, and provide employment opportunities for students.

Faculty and staff, individually and collectively, applying for or participating in governmental grants and contracts must adhere to and comply with all applicable governmental conflict of interest regulations in addition to those outlined in this document.

Purpose:

It is the policy of South Carolina State University that conflicts of interest be avoided if possible, or otherwise satisfactorily managed, reduced or eliminated prior to the expenditure of extramural funds, intramural funds, or any subsequent award. Therefore, the purpose of this policy is to ensure that research is conducted at a high standard by establishing the ground rules that provide a reasonable expectation that the design, conduct, or reporting of funded research, grants, contracts, or cooperative agreements will be free from partiality resulting from a Principal Investigator (PI) or Investigator financial conflicts of interest (and/or of the Investigator's spouse and/or dependent children). This policy complies with the following federal regulation:

- 42 CFR § 50.604 - Responsibilities of Institutions regarding Investigator financial conflicts of interest.

Scope:

At South Carolina State University (SC State), Faculty/Staff participating in, or planning to participate in sponsored program activities funded by Public Health Service (PHS) or National Institutes of Health (NIH) or other federal entities must adhere to this policy.

For sponsored activities that involve subrecipients, the subrecipients must comply with the subrecipient's financial conflicts of interest policy, the subrecipient institution/organization must provide written assurance that it has a financial conflict of interest policy, which follows all applicable federal regulations. For those instances where Public Health Service (PHS) or National Institute of Health (NIH) funds are subcontracted by SC State to a subrecipient institution without a financial conflict of interest policy, a written agreement must be signed by the subrecipient institution stating that this policy shall apply to the subrecipient.

Definitions:

Financial Conflict of Interest – A financial conflict of interest exists when the recipient's designated official(s) reasonably determines that an investigator's significant financial interest could directly and significantly affect the design, conduct, or reporting of the PHS or NIH-funded research.

Faculty- All administrators holding academic appointments and all professors, associate professors, assistant professors, full-time academic instructors, and full-time lecturers who are not degree candidates.

Investigator - The term “Investigator” includes Principal Investigator, Program or Project Director, Co-Investigator, and any person responsible for design, conduct or reporting of research, educational, or service activities funded or proposed for funding, by an external agency.

National Science Foundation (NSF) - The NSF is an independent research agency created by the National Research Foundation Act of 1950. Its aim is to promote and advance scientific progress in the United States.

Outside Professional Activities- The work for a non-university entity or for oneself, whether compensated, involving the use of the employee’s expertise, the practice of the employee’s profession or any other activity that contributes to the employee’s professional competence and development and thereby, increases, or has the potential to increase the employee’s value to the University.

Public Health Service (PHS) - PHS means the Public Health Service of the U.S. Department of Health and Human Services, and any components of the PHS to which the authority involved may be delegated, including the National Institutes of Health (NIH).

Research- a systematic investigation, study or experiment designed to develop or contribute to generalizable knowledge relating broadly to public health, including behavioral and social-sciences research. The term encompasses basic and applied research (e.g., a published article, book, or book chapter) and product development (e.g., a diagnostic test or drug).

Sponsored Agency – The organization or entity responsible for funding a grant, cooperative agreement, or contract.

The University – South Carolina State University (SC State)

Significant Financial Interest (SFI)- consist of one or more of the following interests of the Investigator (and/or of the Investigator’s spouse and/or dependent children) that reasonably appears to be related to the Investigator’s institutional responsibilities.

South Carolina State University
Office of Sponsored Programs
RESEARCH FINANCIAL CONFLICT OF INTEREST POLICY

- a. Regarding 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 the 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 interests 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. Regarding any non-publicly traded entity, a *significant financial interest (SFI)* 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 (and/or the Investigator's spouse and/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.
- d. PHS-funded investigators, any reimbursed or sponsored travel related to an Investigator's institutional responsibilities, including that which is paid on behalf of the investigator so that the exact monetary value may not be readily available

An Investigator is required to disclose all financial interests received from a foreign Institution of higher education or the government of another country. In each case when the regulation refers to exclusions of Institutions of higher education as defined in 20 U.S.C. 1001(a) or a federal, state, or local government agency, the reference is made to a United States (U.S.) Institution of higher education or a federal, state, or local government agency within the U.S.

The term *significant financial interest (SFI)* **does not include** the following types of financial interests:

- Salary, royalties, or other remuneration paid by South Carolina State University to the Investigator if the investigator is currently employed or otherwise appointed by the University.
- Income from seminars, lectures, or teaching engagements sponsored by public or nonprofit entities. Income from seminars, lectures, or teaching engagements sponsored by a federal, state, or local 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.

- Intellectual property rights assigned to SC State and agreements to share in royalties related to such rights.
- Equity interests through investment vehicles, such as mutual funds and retirement accounts, if the Investigator does not directly control the investment decisions made in these vehicles.
- Income from service on advisory committees or review panels for a federal, state, or local government agency, a qualifying institution of higher education, an academic teaching hospital, a medical center or a research institute that is affiliated with a qualifying institution of higher education.
- Sponsored or reimbursed travel sponsored or paid by a federal, state or local government agency, a qualifying institution of higher education, an academic teaching hospital, a medical center or a research institute that is affiliated with a qualifying institution of higher education.
- Travel by a PHS-funded Investigator 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.

Policy

South Carolina State University expects its faculty/staff, researchers, and students to immediately report conflicts upon discovery, and to subsequently resolve with the University any possible conflict of interest stemming from activities in which they are involved. This disclosure must be submitted to the office of the Associate Provost for Sponsored Programs and Research within 30 days after he/she becomes aware of new SFI.

It is required that each Principal Investigator (PI) complete the annual disclosure form even if they have no financial interest to report. Disclosure by the PI is also required at the time a research proposal is submitted to the office of Sponsored programs at SC State University in order to ensure compliance with Federal disclosure and management requirements.

Procedure/Guidelines

General- SC State University is committed to its mission of teaching, research, and service. Therefore, it is imperative that activities performed in these areas by the University's faculty and staff members are done in an environment that is free of conflicts of interest. It is the policy of South Carolina State University that conflicts of interest be avoided if possible, or otherwise

satisfactorily managed, reduced or eliminated prior to the expenditure of extramural funds, intramural funds, or any subsequent award.

South Carolina State University continues to expand its research opportunities and capabilities, and therefore, encourages faculty interactions with private sectors and governmental entities. Contractual agreements and grants from these entities provide an important source of funds. These contracts and grants allow the University to enhance its infrastructure, provide quality educational experiences for its faculty/staff and students, and provide employment opportunities for students.

Faculty and staff, individually and collectively, applying for or participating in governmental grants and contracts must adhere to and comply with all applicable governmental conflict of interest regulations in addition to those outlined in this document.

Conflicts of Interest - Areas in which the University's mission or the professional and ethical conduct of its faculty might be compromised are outlined below:

- A potential conflict of interest occurs when investigators can influence the University's activities in ways that inappropriately enhance personal gain, financially or otherwise.
- A potential conflict of interest occurs when an individual's external professional activities interfere with the individual's obligations to students, colleagues, and the University.

Responsibilities of the Investigator - The Investigator must disclose all conflicts of interest (financial or otherwise). The following responsibilities are outlined below:

- Disclose all Conflicts of Interest (COI) that appear to be directly and significantly affected by the research, educational, or service activities funded, or proposed for funding, by an external agency
- Disclose all entities whose interests would reasonably appear to be directly and significantly affected by such activity.
- Submit (in writing) the COI to the appropriate University official, to whom the individual reports, with copies to the Office of Sponsored Programs. The Office of Associate Provost for Sponsored Programs and Research. The Associate Provost for Sponsored Programs and Research will notify the Investigator's Dean of the College, the Provost and Vice President for Academic Affairs. In case of conflicts of interest relating to students, disclosure shall be reported to the Departmental Chair and Dean/Director of the appropriate investigator. Failure to report actual conflicts of interest will result in appropriate disciplinary action by the University; to include possible verbal and/or written reprimand, suspension, or termination if appropriate

South Carolina State University
Office of Sponsored Programs
RESEARCH FINANCIAL CONFLICT OF INTEREST POLICY

- Complete the “University Conflict of Interest Disclosure Form” and provide all required documentation. The completed form must be submitted with all proposals to the Office of Sponsored Programs using normal University procedures.
- Update conflict of interest annually or as conflicts change during the period of the sponsored project.
- If acting as the PI/PD, providing a list of individuals who meet the definition of “investigator” within the required disclosure timeline.
- Complete all required training and education.
- Ensure that an updated FCOI is on file in the Office of Sponsored Programs for any new research proposals.

The University’s Responsibilities Regarding Conflict of Interest of Investigators- South Carolina State University must:

- Maintain an appropriate written policy on Conflict of Interest.
- Disseminate policies to its employees (policy will also be posted on the website).
- Inform investigators of reporting responsibilities.
- Take the appropriate steps, to ensure that outside investigators (employed by other entities) working on the activity as sub-grantees, contractors, or collaborators comply with the University’s policy on Conflict of Interest.
- Appoint an authorizing official(s) to solicit and review financial disclosure statements from each investigator who is planning to participate in NSF and PHS projects or any other sponsored projects.
- Ensure that all financial disclosures, during the period of the award are updated on an annual basis.
- Provide guidelines to identify conflicts of interest and take the appropriate steps to ensure that conflicts of interest are managed, reduced, or eliminated.
- Maintain records of all financial disclosures and action(s) taken by the University.
- Establish adequate enforcement procedures and provide sanctions where necessary.

- Certify that:
 - a) It has in place, a written and enforceable administrative process to eliminate conflicts of interest pertaining to all research and educational projects for which funds are sought from external funding agencies.
 - b) It will report to the funding agency the existence of any conflict of interest.
 - c) Make available information (upon request) to the funding agency regarding all conflicting interests identified by the University and the procedures used to manage, reduce, or eliminate and protect the research from prejudice.

Review of FCOIs

SC State's Office of Sponsored Programs (OSP) conducts an initial review of all FCOI disclosures. If necessary, OSP will obtain additional information from the investigator and other individuals to help determine whether the SFI disclosed is related to a proposed or existing sponsored activity or program. OSP will then formally identify cases that require further review by the University's management team.

The University's Research Committee (RC) will review the collected information to determine whether a financial conflict of interest exists by considering the following:

- Impact on integrity of research data:
- Risks to rights and safety of animal and/or human research subjects:
- Risks to the rights of students and trainees participating in research; and appearance of conflict of interest.

If a financial conflict of interest is identified, the RC will determine whether the research can be undertaken.

Management of Conflicts of Interest – The established Research Committee shall have scheduled meetings to review cases of “Significant Financial Interest” or other conflicts of interest referred to it, and make recommendations as to strategies necessary to manage, reduce, or eliminate such interests.

The members of the Research Committee represent a diversity of disciplines and personnel at the University.

In the case where the RC determines that there is a conflict of interest, the following conditions or restrictions may be imposed by the University to manage, reduce, or eliminate the Conflicts of Interest:

- Public disclosure of significant financial interest or other conflicts of interest.
- Monitoring research by independent reviewers.
- Modification of the investigator(s) research plan.
- Change of personnel or personnel responsibilities or disqualification from participation in all or a portion of the research.
- Disqualification of the investigator (s) from participating in all or portions of the sponsored project.
- Divestiture of significant financial interests or other conflicts of interest of the investigator(s); or
- Severance of the relationship that creates actual or potential conflicts.

The Chair's, Dean's/Director's Office, in consultation with the Office of Sponsored Programs, shall be responsible for enforcing the above conditions/restrictions and imposing sanctions as appropriate for non-compliance. The University shall be responsible for notifying the sponsoring agency of Financial Conflicts of Interest, which it is unable to resolve satisfactorily.

The Investigator will be provided a draft of the plan of action for review and comment before it is finalized. The Investigator(s) and their immediate supervisor must sign the approved plan to acknowledge their agreement to comply.

If the Institution identifies an SFI that was not disclosed or reviewed in a timely manner it will initiate the review process and an interim plan of action will be implemented when necessary.

Monitoring

Investigator compliance with plans of action will be monitored by the Office of Sponsored Programs. The frequency of monitoring will be in accordance with the sponsor/agency requirements.

Research Involving Humans

Special consideration and scrutiny must be given to protect human subjects in research. Investigators with an identified financial conflict of interest or a significant financial interest that could directly and significantly affect the design, conduct, or reporting of the research shall not ordinarily participate in any research involving human subjects. This presumption against the participation in human subjects' research by financially interested individuals may be rebutted by compelling circumstances. Compelling justification may include factors such as unique investigator expertise, unique institutional resources, unique access to particular patient populations, nature of the science, level of risk to human subjects and the degree to which the financial conflict of interest and the research are related.

The compelling justification and the degree of risk to human subjects must be presented and reviewed by the Research Committee (RC). If compelling circumstances justify a waiver of this policy, the research will be subject to the development and implementation of an action plan to ensure the safety of human subjects and the integrity of the research. The RC must review the research with consideration given to the requirements of the action plan. The RC may require additional safeguards to be implemented but may not determine less stringent financial conflict of interest management requirements.

Appeals

Investigators may appeal RC decisions in writing within 15 days of receipt of the finalized action plan or other decision of the committee. The written appeal should include details regarding circumstances, which support the request for a proposed revision to a RC decision. An Appeals Committee will be formed for purposes of investigating the appeal and making a final decision. A meeting of the Appeals Committee will be convened to review the SFI information, the Management and Monitoring Plan, and previous meeting minutes. The Investigator may be invited to describe reasons for the appeal and to address further questions.

The appeals process will take no more than 60 days from the date requested by the Investigator. The decision of the Appeals Committee is final and binding.

Confidentiality

Financial and other information disclosed in compliance with this policy will be kept confidential and disclosed only on a need-to-know basis as required to perform appropriate review and evaluation required by the policy, except in the case of required public accessibility of identified financial conflicts of interest held by senior/key personnel.

Enforcement

Failure on the part of an Investigator to comply with this policy will result in disciplinary action and/or sanctions which may include formal reprimand, non-renewal/termination of appointment or affiliation, additional training requirements, additional supervision, closing existing research or denying future research by the Investigator, and/or any other enforcement action mandated by the applicable funding agency or SC State.

Policy Revision

SC State may modify this policy to conform to organizational changes and circumstances including revisions to federal or state law or regulations. The RC will have 30 business days to review and comment on any proposed revisions.

The SC State's Board of Trustees is responsible for granting final approval for this policy revisions. It will review all proposed revisions, in collaboration with the senior management at the University, and provide it feedback and/or final decision.

Additional Requirements

The following **additional** requirements also apply to all research funded by the PHS of the U.S. Department of Health and Human Services and any PHS Awarding Component including the NIH.

Reporting

SC State will provide to the PHS Awarding Component a FCOI report as outlined in the regulations:

Initial Report: Prior to expenditure of any funds under the NIH-funded research project, the Institution will provide a FCOI report regarding any SFI found to be a FCOI. SC State will also provide a FCOI report within 60 calendar days from the date of a new SFI disclosure determined to be a FCOI, a new Investigator with an identified FCOI becomes engaged in the project or when the Institution identifies a FCOI not previously disclosed. This report will include the following information:

- Grant/Contract Number
- Project Title
- PD/PI
- Name of Investigator with FCOI
- Nature of the FCOI (e.g., equity, consulting fees, travel reimbursement or honoraria)
- Value of the financial interest or a statement that the interest is one whose value cannot be readily determined through reference to public prices or other reasonable measures of fair market value
- Description of how FCOI relates to PHS-funded research and the basis for the determination that the financial interest conflicts with such research
- Key elements of the FCOI action plan

Annual updates to this report will be submitted to the PHS Awarding Component for the duration of the research project. The annual report will include:

- Status of the FCOI
- Changes to the action plan

- Justification that an FCOI no longer exists

Subrecipients

For PHS-funded research that involves subcontractors, subgrantees or sub awardees (collectively subrecipients) at other Institutions, SC State requires a written agreement that includes terms that establish whether the FCOI policy of the awardee Institution or that of the subrecipient Institution will apply to subrecipient Investigators. This agreement will specifically address time periods to meet disclosure and/or financial conflict of interest reporting requirements.

Subrecipient Institutions who rely on their Financial Conflict of Interest policy must report identified financial conflicts of interests to the SC State in sufficient time to allow SC State to report the FCOI to the PHS Awarding component.

Subrecipients who do not have such a conflict-of-interest policy will be required to follow the SC State's FCOI. A subrecipient's failure to promptly comply with the SC State's policy will be considered grounds for immediate termination by SC State of any applicable subcontract or subaward. The written agreement terms required by SC State will contain a provision that subrecipients will report to SC State as the pass-through entity, any identified FCOI in sufficient time to allow SC State to report and manage the FCOI and meet the reporting obligations described above.

Public Accessibility

This policy will be posted on the SC State's public website (SCSU.edu). In addition, information concerning identified FCOIs held by senior/key personnel will be made available to requestors via **an email** response within five business days from when the Office of Sponsored Programs receives the request. This information may be requested by **emailing** OSP-FCOI@scsu.edu

The written response will include:

- Senior/key personnel name
- Senior/key personnel's role in the research project
- Name of the entity in which the FCOI is held
- Nature of the FCOI
- Approximate dollar value of the FCOI or a statement that the value cannot be readily determined

This information will remain available for three years from the date the information was most recently updated.

Training Requirements

PHS-funded Investigators must complete FCOI training prior to engaging in research related to any PHS-funded grant or contract and at least every five years thereafter. Training must also be completed *as soon as reasonably possible* under the following circumstances:

- This policy changes in a manner that affects Investigator requirements
- An Investigator is new to a subrecipient and will be working on PHS- funded research
- An Investigator is found to be noncompliant with this policy or their approved action plan

Investigator/Institutional Non-Compliance

If an SFI is not disclosed or reviewed in a timely manner, SC State will review the Investigator's financial interest, and determine if it is related to PHS-funded research; determine whether an FCOI exists, and if so:

- Implement an action plan for ongoing research, at a minimum implement an interim action plan.
- Complete a retrospective review of Investigator's activities and the PHS- funded research project within 90 days of a non-compliance finding to determine if bias was present in the design, conduct, or reporting of such research; and
- If bias/non-compliance is found, the Institution will promptly inform the PHS Awarding Component by submitting a mitigation report;

If the retrospective review finds that the Investigator knew or should have known about the FCOI related to his/her institutional responsibilities, but failed to disclose in compliance with this policy, the costs associated with the retrospective review and mitigation report may be pulled from the subrecipient's Indirect Cost Allocation portion. If the U.S. Department of Health and Human Services determines that a PHS-funded clinical research project whose purpose is to evaluate the safety or effectiveness of a drug, medical device, or treatment has been designed, conducted, or reported by an Investigator with a conflicting interest that was not managed or reported to SC State, the Investigator must disclose the FCOI in each public presentation of the results of the research and must request an addendum to previously published presentations.

NIH Reporting Requirements

If SC State is unable to satisfactorily manage a conflict of interest involving NIH funding, it will appropriately notify NIH's Office of the General Counsel.

Responsibilities and Authorities:

Investigators participating in, or planning to participate in the design, conduct, or reporting of research including Public Health Service (PHS) or National Institutes of Health (NIH) funded research at SC State have the authority and responsibility for the activities in this policy.

Records

SC State will maintain all records related to the implementation of this policy for at least three years after:

- the date of creation.
- the date of termination or completion of a research award or contract.
- the submission of the final expenditures report; or
- the date of final resolution of any investigation, audit, or similar action involving the records.

**SOUTH CAROLINA STATE UNIVERSITY
FINANCIAL CONFLICT OF INTEREST (“FCOI”) DISCLOSURE FORM**

For Sponsored Projects

Investigators are responsible for reading the NIH Regulations on Financial Conflict of Interest, including details of all disclosure requirements, and the Institutional Policy prior to completing this form:

1. NIH Financial Conflict of Interest Overview: <http://grants.nih.gov/grants/policy/coi/>
 - a. “Federal Register Notice” Full Text of Regulations: http://grants.nih.gov/grants/policy/coi/fcoi_final_rule.pdf
 - b. Summary of major changes between the 1995 and 2011 regulations: “summary_of_major_changes.doc” at link in item 1. above
 - c. FAQs: http://grants.nih.gov/grants/policy/coi/coi_faqs.htm
 - d. Web-based Tutorial for the revised regulations: <https://www.citiprogram.org/default.asp>

 2. SC State University Policy on Financial COI Sponsored Projects”, click <https://www.scsu.edu/osp>
-

INVESTIGATOR’S NAME:

DATE:

EMPLOYEE 900 ID or last 4

digits of SSN#, if not on Campus:

DEPARTMENT:

South Carolina State University
Office of Sponsored Programs
RESEARCH FINANCIAL CONFLICT OF INTEREST POLICY

COLLEGE:

SPONSORING AGENCY:

TITLE OF PROJECT:

PROJECT PERIOD:

PROPOSED/AWARD AMOUNT:

PROPOSAL /AWARD NUMBER:

The purpose of this disclosure statement is to allow for investigators at South Carolina State University, to declare that no indeterminate conflict exists between their outside financial interests and/or non-financial interests and their commitment to the research, educational, and service activities funded by a sponsoring agency. The information contained herein is consistent with the current Federal guidelines requiring limited and targeted financial disclosure and review of the disclosure by the appropriate University official(s). This disclosure form is to be used to publish specific facts relating to the investigator's sponsored project and to help the appropriate reviewer determine if a conflict of interest exists so that the University can manage, reduce or eliminate the conflict. Therefore, the investigator must carefully read the following statement.

South Carolina State University
Office of Sponsored Programs
RESEARCH FINANCIAL CONFLICT OF INTEREST POLICY

For the project named above, I am the individual who is responsible for the design, conduct, or reporting of the sponsored project funded by the sponsoring agency named above or proposed for such funding. I understand that I must disclose all potential conflicts of interest to include Significant Financial Interests, which is defined as anything of monetary value, including but NOT limited to, salary or other payments for services (e.g. consulting fee or honoraria); equity interests (e.g., stocks, stock options or other stock options or other ownership interests); and intellectual property rights (e.g., patents, copyrights and royalties from such rights). Further, it is my understanding that this disclosure is not only for me, but also for my spouse and children. The term "financial interest" used in this section does NOT include:

- Salary, royalties, or other remuneration paid by South Carolina State University to the Investigator if the investigator is currently employed or otherwise appointed by the University.
- Income from seminars, lectures, or teaching engagements sponsored by public or nonprofit entities. Income from seminars, lectures, or teaching engagements sponsored by a federal, state, or local 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.
- Intellectual property rights assigned to SC State and agreements to share in royalties related to such rights.
- Equity interests through investment vehicles, such as mutual funds and retirement accounts, if the Investigator does not directly control the investment decisions made in these vehicles.
- Income from service on advisory committees or review panels for a federal, state, or local government agency, a qualifying institution of higher education, an academic teaching hospital, a medical center or a research institute that is affiliated with a qualifying institution of higher education.
- Sponsored or reimbursed travel sponsored or paid by a federal, state or local government agency, a qualifying institution of higher education, an academic teaching hospital, a medical center or a research institute that is affiliated with a qualifying institution of higher education.
- Travel by a PHS-funded Investigator 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.

Based on the above statement, does the proposal named above which is being submitted to the sponsoring agency listed above contain an actual conflict of interest or a potential conflict of interest?

South Carolina State University
Office of Sponsored Programs
RESEARCH FINANCIAL CONFLICT OF INTEREST POLICY

YES

NO

If yes, give a detail explanation of the nature of the conflict (use separate sheets) by *providing the following details regarding the entity, your financial interest, income, and travel, then read the Certifications and sign below as "Investigator."*)

Name of Entity (corporation, partnership, private practice, non-publicly traded entities, etc.):

Address of Entity:

Principal Type of Business:

How does the financial interest relate to PHS-funded research?

Did remuneration received from the entity in the twelve months preceding the disclosure* (see exclusions below*) AND the value of any equity interest in the entity as of the date of disclosure, **when aggregated**, exceed \$5,000? Yes___ No___

***Exclusions** -- excluded from income disclosure: NOT required to disclose income from seminars, lectures, or teaching engagements sponsored by and service on advisory or review panels for a federal, state or local government agency, an Institution of higher education NOT required to disclose income from investment vehicles, such as mutual funds and retirement accounts, as long as the Investigator does not directly control the investment decisions made in these vehicles.

Do you have income from an interest in any intellectual property rights impacted by the project?
Yes___No___

In the last 12 months, did you receive reimbursed or sponsored travel from the entity**?
Yes___No___ . If "Yes," please provide the following trip details:

1. Purpose of trip: _____

South Carolina State University
Office of Sponsored Programs
RESEARCH FINANCIAL CONFLICT OF INTEREST POLICY

2. Sponsor/Organizer: _____

3. Destination: _____

4. Duration: _____

****Exclusions --** excluded from travel disclosure: NOT required to disclose 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. The Institution will determine if any travel requires further investigation, including determination or disclosure of the monetary value.

Investigator Certification:

- I agree to complete FCOI training *prior to* engaging in research related to any PHS/NIH-funded grant or contract and at least every four years thereafter; and, immediately upon other events, as defined per campus policy. Upon completion of each training session, I will send an email confirming completion to: OSP-FCOI@scsu.edu
- If the proposed project is funded by PHS/NIH, I agree, for the duration of the project, to update this disclosure either on an annual basis, or within 30 days if new reportable significant financial interests are obtained (such as through purchase, marriage, or inheritance, for example).
- I agree to provide additional details needed by SC State to meet NIH's institutional filing, annual reporting and other requirements, and to cooperate in the development of a Management Plan to address any actual or potential conflict of interest identified via this Disclosure.
- If I participate in a project involving subrecipient organizations, I agree to assist SC State in obtaining required disclosures in a timely manner from all subrecipient Investigators, and to assist SC State, if requested, to manage any FCOIs of a subrecipient Investigator to assure compliance with these regulations.
- I agree to comply with any retrospective reviews, conditions or restrictions imposed by SC State to manage, reduce, or eliminate actual or potential conflicts of interest or forfeit the award.

Signed: _____
Investigator

Date: _____

To be Endorsed/Signed Only by SC State Official:

SC State Endorsements: I have reviewed the significant financial interest disclosure and believe that no significant financial interest exists or if one does exist that it is possible to develop and execute, prior to award, a Resolution Plan to manage, reduce or eliminate any actual or potential

South Carolina State University
Office of Sponsored Programs
RESEARCH FINANCIAL CONFLICT OF INTEREST POLICY

conflict of interest; and, therefore, I recommend that the proposal be submitted to the agency at this time.

Signed: _____ Date: _____