

CONFLICT OF INTEREST POLICY FOR INVESTIGATORS

Ferris State University (FSU) is committed to maintaining objectivity in research by ensuring that the design, conduct and reporting of research will not be biased by any conflicting interests. Federal regulations require institutions to have policies and procedures in place to ensure investigators disclose any significant financial interest that would reasonably appear to affect the activities of proposed or funded research by external sponsors. This policy has been set forth to provide guidance for investigators to help them avoid conflicts and potential accusations of misconduct.

Investigator Responsibilities:

1. Become familiar with the federal regulations (revised in 2011) and Ferris' Conflict of Interest policy.
2. Complete online training on Conflict of Interest via CITI program, as required per external sponsors.
3. Disclose Significant Financial Interests (SFI) to the University annually or prior to proposal submission. Disclosures must be made within 30 days of discovering or acquiring a new SFI.
4. Comply with any management plan issued by the University and retain documentation to demonstrate compliance.

University Responsibilities:

1. Establish review and enforcement mechanisms; maintain appropriate records to show compliance.
2. Make public disclosure of a significant financial interest if requested by a funding agency.

Definitions

“**Investigator**”, under this policy, is defined as the principal investigator, co-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 an external sponsor. The term applies to collaborators, sub-grantees, contractors, consultants, post-doctoral fellows, graduate students and others. (See below for rules about Investigator’s spouse and dependent children.)

Conflict of Commitment (COC): Faculty members are expected to devote their primary professional time to teaching, research, service and administrative responsibilities. Outside financial interests and activities should not interfere with these commitments.

Conflict of Interest (COI): A financial conflict of interest (FCOI) exists when a significant

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financial interest could directly and significantly affect the design, conduct, or reporting of the research or educational activities funded by an external sponsor. The Research Director will establish procedures to reasonably determine if an actual or potential financial conflict of interest exists.

Financial Interest is anything of monetary value, whether or not the value is readily ascertainable.

Significant Financial Interest (SFI) is defined as a financial interest that consists of one or more of the following interests of an Investigator and those of the Investigator's spouse and dependent children that reasonably appear to be related to the Investigator's Institutional responsibilities. A SFI exists if:

1. Public Traded Entity: 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.
2. Non-public traded entity:
 - a. If the value of any remuneration received from the entity in the twelve months preceding the disclosure, when aggregated, exceeds \$5,000, or
 - b. when the Investigator (or the Investigator's spouse or dependent children) holds any equity interest (e.g., stock, stock option, or other ownership interest); or
3. Intellectual property rights and interests (e.g., patents, copyrights): Upon receipt of income related to such rights and interests.
4. Travel: Any reimbursed or sponsored travel (paid on behalf of the investigator and not reimbursed to the Investigator). This does not include travel reimbursed or sponsored by government agencies, higher education institutions, teaching hospitals, medical centers, etc.

*Remuneration includes salary and any payment for services not otherwise identified as salary (e.g., consulting fees, honoraria, paid authorship).

The term does not include:

1. Salary, royalties, or other remuneration from the applicant institution;
2. Income from seminars, lectures, or teaching engagements sponsored by public or nonprofit entities;
3. Income from service on advisory committees or review panels for public or nonprofit entities.

Significant Financial Interest Disclosure
Applicable to All Sponsored Project Proposals

Name: _____ Department/College or Unit _____

Project Title: _____ Sponsor: _____

Project Role: PI Co-PI Other: _____

Instructions: Check all that apply to items 1 and 2 as appropriate.

1. I am disclosing the following significant financial interests related to this project and held by my spouse, dependent child(ren), or myself:

Yes, as indicated below:

- Salary or other payments for services (e.g., consulting fees or honoraria)
- Equity interests (e.g., stocks, stock options, or other ownership interests)
- Intellectual property rights (e.g., patents, copyrights, and royalties from such rights)
- Travel - any reimbursed or sponsored travel except federal agencies, etc.
- Other significant financial interest of the investigator that possibly could affect or be perceived to affect the results of the research or educational activities funded or proposed for funding.

No, I have nothing to disclose.

2. I am attaching supporting documentation (in separate document marked *confidential*) that identifies the business enterprise or entity involved and the nature and amount of the interest:

Yes No

3. I agree:

- to update this disclosure during the period of the award, either on an annual basis, or as new reportable significant financial interests are obtained;
- to cooperate in the development of a memorandum of understanding that constitutes a conflict of interest "resolution plan" if so required;
- to comply with any conditions or restrictions imposed by the University to manage, reduce, or eliminate conflicts of interest or forfeit the award.

Signed: _____ Date: _____

Endorsements:

I have reviewed the significant financial interest disclosure and believe that it will be possible to develop and execute, prior to the institution's expenditure of any funds under the award, a memorandum of understanding to manage, reduce, or eliminate any conflict of interest; and, therefore, I recommend that the proposal be submitted to the agency at this time.

Chair/Department Head: _____ Date: _____

College Dean: _____ Date: _____

Statement of Conflict Avoidance

Name: _____

Department or Unit: _____

Company: _____

Address: _____

Licensed Technology: _____

Because of the license granted by Ferris State University to the above company and my equity* position and continuing relationship with this company, I acknowledge the potential for a possible conflict of interest between the performance of research at Ferris State University and my contractual or other obligations to this company. Therefore, I will not without proper authorization:

1. use students for research and development projects for the company;
2. restrict or delay access to information from my FSU research;
3. take direct or indirect research support from the company in order to support my activities at FSU; or
4. employ students at the company, except in accordance with Ferris policies and procedures.

In addition, in order to avoid the appearance of a conflict, I will attempt to differentiate clearly between the intellectual directions of my FSU research and my contributions to the company. To that end, I will expressly inform my department chair and Director of Academic Research annually of the general nature of my activities on behalf of the company.

Employee Signature: _____

Date: _____

Approved by:

Signature: _____ Printed Name: _____
(Chair/Department Head)

Signature: _____ Printed Name: _____
(College Dean)

*"Equity" includes stock, options, warrants, or other financial instruments convertible into Equity, which are directly or indirectly controlled by the inventor.