



FINANCIAL CONFLICT OF INTEREST DISCLOSURE POLICY

Area: University	Number: RI_401
Subject: Financial Conflict of Interest Disclosure	Issued: 2/24/2013
Applies to: Faculty and Staff	Revised: n/a
Sources: Provost and Vice-President for Academic Affairs	Page(s): 1 of 3

I. Purpose

The policy aims to promote objectivity in research by increasing transparency and accountability in the progressively more complex relationships among researchers, research institutions, research sponsors, and the private sector.

II. Policy Statement

As an integral part of its institutional mission, Georgia Southern University upholds the principles of free and unbiased inquiry, transfer of ideas and technologies for public benefit, and stewardship of the resources entrusted to it. As faculty and employees increasingly build complex relationships with private companies, financial and other internal and external relationships must not conflict nor appear to conflict with these principles.

Prior to submitting a sponsored proposal, all investigators must disclose to the university any significant financial interests that they or any member of their immediate family have in any commercial enterprise or with members of the research team that will in any way influence the proposed sponsored program or be affected by its performance or completion. The Vice-President for Research and Economic Development (VPRED) or designee will review each disclosure to determine any financial conflicts of interest, real or potential, and, in collaboration with the Conflict of Interest Subcommittee of the Research Advisory Board and the investigator, design a plan to manage, reduce, or eliminate them.

III. Exclusions

The following conditions are not generally considered evidence of a FCOI:

1. salary, royalties, or other remuneration from GSU;
2. ownership interests in an entity funded through the SBIR or STTR programs;
3. income from seminars, lectures, or teaching engagements sponsored by public, nonprofit, or not-for-profit entities;

4. income from service on advisory committees or review panels for public entities or nonprofit or not-for-profit entities NOT affiliated with for-profit companies;
5. an equity interest that, when aggregated for the investigator and the investigator's spouse and dependent children, does not exceed \$5,000 in value as determined by public prices or other reasonable measures of fair market value and does not represent more than \$5,000 in family members' aggregate ownership interest in any single, publicly traded entity (Note: no exclusion for interest in a nonpublicly traded company); and
6. salary, royalties, or other payments (excluding dividends) from a single corporate entity that, when aggregated for the investigator and the investigator's spouse and dependent children over the next 12 months, are not expected to exceed \$5,000.

IV. Procedures

The Office of Research Integrity facilitates financial conflict of interest (a) training once every four years and (b) disclosure, required annually and prior to proposal submission. See <http://www.georgiasouthern.edu/research/researchintegrity/fcoi>.

Related Information:

The following links aim to accurately describe and promote compliance with the financial conflict of interest policies related to sponsored activity of the University System of Georgia and Georgia Southern University.

National Institutes of Health

- <http://grants.nih.gov/grants/policy/coi/>

National Science Foundation

- [NSF "Investigator Financial Disclosure Policy"](#)
- [NSF "Frequently Asked Questions Concerning the DHHS Objectivity in Research Regulations and the NSF Investigator Financial Disclosure Policy"](#)
- [NSF Proposal and Award Policies and Procedures Guide, January 2011, Part II - Award & Administration Guide, Chapter IV, A. Conflict of Interest Policies](#)
- [NSF Proposal and Award Policies and Procedures Guide, January 2011, Part I - Grant Proposal Guide, Chapter II, C.1.e. Proposal Certifications](#)

U.S. Department of Education

- [34 CFR Part 74, Subpart C § 74.42, Codes of Conduct](#)
- [34 CFR Part 75, Subpart E § 75.525, Conflict of interest: Participation in a project](#)

U.S. Food and Drug Administration

- [21 CFR Chapter 1, Subchapter A, Part 54, Financial Disclosure by Clinical Investigators](#)

U.S. Department of Health and Human Services (including Public Health Service and National Institutes of Health)

- [42 CFR Part 50, Subpart F, Responsibility of Applicants for Promoting Objectivity in Research for which Public Health Service Funding is Sought.](#)
- [45 CFR Part 94, Responsible Prospective Contractors](#)