

*Tuskegee University*  
*Division of Research and Sponsored Programs*

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**Office of Grantsmanship and Compliance**  
**Conflict of Interest Policy**

Applicable to proposals being submitted to government agencies

**What is required?**

Federal regulations require institutions to have policies and procedures in place that ensure that investigators disclose any significant financial interest that may present an actual or potential conflict of interest relationship to externally sponsored projects. Such disclosure must be made prior to the submission of a proposal for funding, and institutions must develop specific mechanisms by which conflicts of interest will be satisfactorily managed, reduced, or eliminated prior to the expenditure of any funds on an award. If a new reportable significant conflict of interest arises at any time during the period after the submission of the proposal through the period of the award, the filing of a disclosure is also required.

**Who is covered?**

“Investigator” means the principal investigator/project director, co-principal investigator, and any other person at the University who is responsible for the design, conduct, or reporting of research, education, or service activities funded, or proposed for funding, by an external sponsor. In this context, the term “investigator” includes the investigator’s spouse and dependent children.

**What must be disclosed?**

Each investigator shall disclose all significant financial interests:

1. that would reasonably appear to be affected by the research, educational, or service activities funded, or proposed for funding, by an external sponsor; or
2. in entities whose financial interests would reasonably appear to be affected by such activities.

**What is covered?**

“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 interests (e.g., stocks, stock options or other ownership interests); and intellectual property rights (e.g., patents, copyrights and royalties from such rights). This does not include:

1. Salary, royalties, or other remuneration from the Tuskegee University;
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;
4. 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, or, constitute more than a five percent ownership interest in any single entity; or
5. Salary royalties, or other payments that when aggregated for the investigator and the investigator’s spouse and dependent children over the next twelve months, are not expected to exceed \$10,000.

**Disclosure Procedures:**

- All investigators must disclose their significant financial interests utilizing this form and attaching all required supporting documentation. The completed form and packet must be submitted with the proposal to the Office of Grantsmanship and Compliance.
- In accordance with Federal regulations, a complete disclosure must be made by investigator(s) prior to submission of the proposal.
- Resolutions to conflicts of interest must be articulated in writing and signed by the investigator(s) and relevant dean(s) prior to expenditure of any award funds.

### **Financial Conflict of Interest Tutorial:**

All principal investigators, staff, and students involved in a U.S. Public Health Services (PHS) research grant are required to complete the National Institutes of Health (NIH) Financial Conflict of interest (FCOI) training tutorial prior to engaging in research related to any PHS-funded grant or contract and at least every four years.

#### *Course Description*

- NIH Financial Conflict of Interest tutorial was designed by the National Institutes of Health to provide educational training on what constitutes financial conflict of interest.
- The Course is required for anyone involved with an NIH funded project.

#### *How to Access the Course — Getting Registered*

- Go to the NIH training website at <http://grants.nih.gov/grants/policy/coi/tutorial2011/fcoi.htm> and follow instructions.
- Once you have completed the tutorial there is an option to print a certificate of completion. Please print the certificate and forward it to Felecia M. Grant, Office of Grantsmanship and Compliance, Chappie James Center Room 103.



I have determined that \_\_\_\_ no  
conflict of interest exists. \_\_\_\_ a  
conflict of interest exists.

\_\_\_\_\_  
VP, Research & Sponsored Programs

Date