

1. The term does not include:

- a. Salary, royalties or other remuneration from the principal investigator's institution;
- b. Income from seminars, lectures or teaching engagements sponsored by public or non-profit entities;
- c. Income from service on advisory committees or review panels for public or non-profit entities;
- d. An equity interest that, when aggregated for the principal investigator and the principal 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 and does not represent, at the time the interest was acquired, more than a 5 percent ownership interest in any single entity; or
- e. Salary, royalties or other payments that meet the criteria specified in IA and IB above and that, when aggregated for the principal investigator and the principal investigator's spouse and dependent children, are not expected to exceed \$10,000 during any one 12-month award term.

III. Disclosures:

- A. Principal investigators must disclose that potential conflict of interest may exist at the time a proposal or application for funding is submitted to the sponsoring agency.
- B. If a principal investigator's financial interest's change during the time the proposal is under review or during the term of an award, the principal investigator must provide an updated disclosure reflecting pertinent changes.
- C. Principal investigators shall provide annual updates of financial disclosures during the term of the applicable grant or contract.
- D. Disclosure shall be made in the form of a signed and notarized statement by the principle investigator(s), which either declares that no financial conflicts of interest exist to the best of the principal investigator's knowledge, information, and belief at the time of the declaration, or lists, to the principal investigator's knowledge and belief, those financial interests which may apply to the project for which the proposal or application is being made.
- E. A Conflict of Interest Review Committee composed of the Research Committee of the Graduate and Research Council, supplemented by the president of the Faculty Senate and a disinterested non-University community member who has expertise in

the field of professional ethics shall be the authorized institutional body to whom disclosures shall be made.

IV. Review:

- A. The Conflict of Interest Review Committee (hereinafter referred to as the Committee) shall review financial disclosures, determine whether a conflict of interest exists and determine what conditions or restrictions, if any, should be imposed by the institution to manage, reduce or eliminate such conflicts of interest.
- B. A conflict of interest exists when a majority of the members of the Committee determines that an principal investigator's significant financial interest could directly and significantly affect the design, conduct or reporting of externally funded research, development or educational activities.
- C. Conditions or restrictions that might be imposed to manage, reduce or eliminate conflicts of interest include:
 1. Public disclosure of significant financial interests;
 2. Monitoring of research by independent reviewers, with said reviewers to be determined by the Committee;
 3. Modification of the research plan, by the principal investigator(s), subject to approval of the modifications by the Committee;
 4. Disqualification from participation in the portion of the externally funded research or educational activities that would be affected by significant financial interest;
 5. Divestiture of significant financial interests;
 6. Severance of relationships that create conflicts.
- D. When the sponsoring agency allows, and if the Committee determines that imposing conditions or restrictions would be either ineffective or inequitable, or that the potential negative impacts that may arise from a significant financial interest are outweighed by the interests of scientific progress, technology transfer, or the public health and welfare, then the Committee may allow the research to go forward without imposing such conditions or restrictions.
- E. The provost will inform the appropriate official at the sponsoring agency immediately if a conflict of interest cannot be satisfactorily managed, reduced or eliminated by the University.

V. Enforcement:

- A. No proposal or application for external support of research, development or educational activities will be approved for submission by the University without a “Disclosure Statement Form” (attachment A) signed by the principal investigator or co-investigators attached to the “Internal Review and Routing Sheet” (attachment B) employed by the University for such purposes.
- B. In the event that the Committee determines that a conflict exists, the principal investigator or co-investigators must agree to the conditions or restrictions deemed appropriate by the Committee before the proposal or application is approved for submission.
- C. In the event of the award of a grant, contract or cooperative agreement, the Committee shall meet with the principal investigator or co-investigators to determine compliance with any imposed conditions or restrictions.
- D. In the event of a principal investigator’s knowledgeable and willful non-compliance with previously agreed-upon conditions or restrictions, the provost shall have the authority to impose appropriate sanctions upon the principal investigator as recommended by the Committee.
- E. Sanctions to be imposed may include:
 - 1. Imposition of further conditions or restrictions upon the conduct of the sponsored research, development or educational activity such as:
 - a. Disqualification from participation in the portion of the externally-funded research or educational activities that would be affected by significant financial interest;
 - b. Disqualification from participation in future externally-funded research or educational activities;
 - c. Termination of employment by the University.

VI. Record keeping:

- A. The University will retain records of all financial disclosures and of all actions taken to resolve conflicts of interest for at least three years beyond the termination or completion of the sponsorship agreement (grant, contract or cooperative agreement) to which they relate, or until the resolution of any sponsoring agency action involving those records, whichever is longer.
- B. The records referred to above shall be housed with the permanent record of the related grant or contract in the Office of Grants and Sponsored Research.

Disclosure Statement

Principal investigator's disclosure statement:

I hereby declare that I have received a copy of, read and understand the APSU policy on disclosure of financial conflicts of interest for externally sponsored research or educational projects, and that I agree to comply with any conditions or restrictions imposed by APSU to manage, reduce, or eliminate conflicts of interest as they pertain to the project represented in the attached proposal or application.

I further declare that as they relate to the project represented in the attached application to

Entitled _____, and dated, _____, to the best of my knowledge, information and belief at this present time, I (initial one)

_____A. do not hold any financial interests, which constitute a conflict of interest as defined in APSU policy 5:056.

_____B. hold the following financial interests, which constitute a conflict of interest as defined in APSU policy 5:056 (list interest below, use additional sheet of paper if necessary):

- 1.
- 2.
- 3.
- 4.
- 5.

Signed

Date

State of Tennessee Subscribed and sworn to (or affirmed) before me this _____ day of _____, 20____, by _____.

Notary Public

My commission expires _____

Austin Peay State University
Office of Grants and Sponsored Programs
Internal Review and Routing Sheet

GSP USE ONLY	DATE:	GSP ID#:
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1. PROJECT TITLE	2. SPONSOR NAME AND ADDRESS:
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3. Project Period:	4. Submission Deadline:
5. Number of Copies to be Submitted:	6. Method of Delivery (check one): <div style="display: flex; justify-content: space-between; width: 100%;"> Hand Deliver Overnight Postmark Fax Electronic </div>

7. Principal Investigator(s): Department Phone E-mail	8. Co-Principal Investigator(s): Department Phone E-mail
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9. Proposed Budget (year one only)	10. For multiple year budgets indicate cumulative amounts.
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Line Item	Agency Support	APSU In-kind & *Cash Match	Other Source of Match	Line Item	Agency Support	APSU In-kind & *Cash Match	Other Source of Match
Salaries & Wages				Salaries & Wages			
Fringe Benefits				Total Direct Costs			
Equipment				F&A			
Supplies				Total Costs			
Travel				<div style="border: 1px solid black; padding: 5px;"> Indirect Cost Rate: 39% of total salaries and wages Fringe Benefit Rates: 28% regular salaries 8% extra labor 1% graduate students 1% student labor </div>			
Tuition							
Consultants							
Contractual							
Other Direct Costs							
Total Direct Costs							
F&A							
Training Stipends							
Total Costs							

Budget Comments (include information on F&A/indirect cost):
If other than 39% of total salary, how was F&A calculated?

11. *NOTE: Please complete this section for all APSU Cash Match				
Fiscal Year	Fund	Organization	Fund Description	Match \$
Total: \$				

Positions

- Yes No Project will require creation of new positions from grant funds.
- Yes No Project will require creation of new positions from institutional funds,

Certifications Regarding Regulatory Compliance

- Yes No All Co-PI/PDs certify that they do not hold significant financial interests related to the project.
- Yes All Co-PI/PD(s) who hold significant financial interests related to the project that may be affected by the project have filed the appropriate disclosure statements.
- Yes No All Co-PI/PDs certify that they are not delinquent on any Federal debts and are bedarred or susoended from receipt of Federal funds.

Space and Equipment Needs (If Yes to any of the following questions, identify the University administrator responsible with a support letter from that administrator.)

- Yes No Will space be required for office(s), office equipment, instructional or research equipment?
- Yes No Will space alterations be required for office(s), office equipment, instructional or research equipment?
- Yes No Will space require additional electrical service for equipment/computers?

Academic and Administration Program Changes (If Yes, attach a letter of explanation.)

- Yes No Will this project involve the development or implementation of a new academic major, new academic degree, or new interdisciplinary arrangement?
- Yes No Does this proposed project envision an advising or governing role for a project committee?
- Yes No Is it anticipated that this project will create a new administrative unit?

Institutional Obligations (If Yes, attach a letter of explanation.)

- Yes No If the project is funded, will APSU, or any unit within APSU, be responsible for continuation of it in any respect when it expires?

Compliance Review	Human Subjects	Patent and Copyright
	Animal Subjects	Laboratory Safety
	Hazardous Materials	Other

Funded Projects

Is billing required? Yes No
 If yes, who will do the billing? Grants Accounting Your Org. Other _____
 What is the frequency of billing? Monthly Quarterly Semi-annual Annual

Are reports required? Yes No
 If yes, which? Financial Project Summary Project and Patent Other _____

Is PI responsible for any reports? Yes No
 If yes, which ones? _____

Will grant money go into a pre-existing fund (account)? Yes No
 If yes, which fund(s)? _____

Approvals: (Commitments of resources must be approved by all cognizant unit heads. Include % of responsibility each Co-PI will commit toward this project. If there are other PI's, please include an attachment.)			
	% of time on this project	GSP will obtain the signatures listed below.	
Principal Investigator/Project Director	Date	Director of Research and Sponsored Programs	Date
	%		
Principal Investigator/Project Director	Date	Dean of Graduate Studies	Date
	%		
Principal Investigator/Project Director	Date	Vice President for Academic and Affairs	Date
Chairperson or Unit Head	Date	Vice President for Finance and Administration	Date
Dean, Director or Vice Chancellor	Date	President	Date