

Policy Revision Checklist for Policy #

1. Start Group preparing the revision

2. To Legal Affairs and Strategic Planning
Request the Word version of a policy.

3. To Initiating Authority of the Policy
Provost
Vice President for Student Affairs
Director of Affirmative Action
Vice President for Finance and Administration
Executive Director for University Advancement
Inform the Initiating Authority of the request to revise the policy.

4. To Group preparing the revision
Revise the policy following policy 0:001 for format.

5. If the policy is academic, then

To Faculty Senate Executive Committee
Review the policy.

To Faculty Senate
Vote on the policy.

To Deans' Council
Vote on the policy.

To Academic Council
Vote on the policy.

6. To Legal Affairs and Strategic Planning
Prepare the policy for the next Policy Committee meeting.

7. To University Policy Committee
First Reading
Review the policy.
Second reading
Review an academic policy for information.
Vote on implementation, revision, or revocation of a non-academic policy.

8. To Legal Affairs and Strategic Planning
If the policy is approved, prepare the policy for the President to approve and sign.

9. To President
Approve and sign the policy.
Reject the revision.
Return the policy to Step 4 (or to Faculty Senate Executive Committee) for final revision.

10. To Legal Affairs and Strategic Planning
Post the policy to the web, send an electronic copy to the library, post it in The Gov, and keep the original on file along with any back-up material.

~~AUSTIN PEAY STATE UNIVERSITY
POLICIES AND PROCEDURES MANUAL~~

Comment [ss1]: Eliminate entire policy.

Policy Number: 7:006	Supersedes Policy Number: 99:024
Date: April 26, 2006	Dated: February 12, 1996
Subject: Financial Conflict of Interest on Externally Sponsored Projects	Mandatory Review Date: April 26, 2011
Initiating Authority: Director, Office of Grants and Sponsored Research	TBR Policy/Guideline Reference:
Approved: _____ Presidents: signature on file	

~~Austin Peay State University adheres to the policies on financial conflict of interest established by the National Science Foundation (NDS GPM 510) and the U. S. Department of Health and Human Services, Public Health Service (42 CFR part 50, Subpart F and 45 CFR subtitle A, part 94), which became effective Oct. 1, 1995, and as they pertain to research and other projects funded or sponsored by those or other organizations:~~

~~I. Principal investigators on externally sponsored research, development and education projects must disclose to an authorized APSU representative all significant financial interests related to the project in question (including those of the principal investigator's spouse and dependent children) when so required by written regulation or policy of the sponsoring organization. Financial interests related to the project in question are those which:~~

~~A. Can be affected by the research or educational activities funded by external agencies or organizations; or~~

~~B. Are held in entities whose financial interests can be affected by such activities.~~

~~II. Definitions:~~

~~A. The term "principal investigator" means the person at the institution who is accountable for the design, conduct or reporting of research or educational activities funded by external agencies.~~

~~B. "Significant financial interest" means anything of a monetary value that meets the criteria outlined in IA and IB, above, and that exceeds \$10,000 during the period of any one award year, including, but not limited to, salary or other payments for services (e.g., consulting fees or honoraria); equity interest (e.g., stocks, stock options or other ownership interests); and intellectual property rights (e.g., patents, copyrights, and royalties from such rights).~~

~~I. 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.~~

Comment [ss2]: We don't do this. I can add a statement to the routing form. That is normal on a routing form, but is not on ours due to space.

~~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;~~

~~e. 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 _____.

_____ B. hold the following financial interests, which constitute a conflict of interest as defined in APSU policy _____ (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

Comment [ss3]: This is the old form. I would advise not attaching a form directly to a policy, as it significantly limits our capacity to make ongoing changes for process improvement.

GSP USE ONLY	DATE:	GSP ID#:	
1. PROJECT TITLE		2. SPONSOR NAME AND ADDRESS:	
3. Project Period:		4. Submission Deadline:	
5. Number of Copies to be Submitted:		6. Method of Delivery: Mail <input type="checkbox"/> Hand Deliver <input type="checkbox"/>	
		Overnight <input type="checkbox"/> Postmark <input type="checkbox"/> Fax <input type="checkbox"/> Electronic <input type="checkbox"/>	
7. Principal Investigator(s):		8. Co-Principal Investigator(s):	
Department		Department:	
Phone		Phone	
E-mail		E-mail	
9. Proposed Budget (year one only)			
		APSU	
	Agency	In-kind & *Cash Match	Other Source
Line Item	Support		
Salaries & Wages	-	-	-
Fringe Benefits	-	-	-
Equipment	-	-	-
Supplies	-	-	-
10. For multiple year budgets indicate cumulative amounts:			
		APSU	
	Agency	In-kind & *Cash Match	Other Source
Line Item	Support		
Salaries & Wages	-	-	-
Total Direct Costs	-	-	-
F&A	-	-	-
Total Costs	-	-	-

Travel	-	-	-	-	-	-	-	-
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: \$								

Indirect Cost Rate:	-
— 39% of total salaries and wages	-
Fringe Benefit Rates:	-
— 28% regular salaries	-
— 8% extra labor	-
— 1% graduate students	-
— 1% student labor	-

GSP 8/02