

**Office of Sponsored Research and Programs  
Southeastern Louisiana University  
Financial Conflicts Of Interest Related To Externally Sponsored Projects**

**WHAT IS REQUIRED?**

The Public Health Service (including the National Institutes of Health) and the National Science Foundation (NSF) require that, for each proposal submitted to that agency, the PI certify that he or she has appropriately disclosed any significant financial interests related to that proposal. Prior to expending any award funds, Southeastern must determine how any potential conflict will be managed, reduced or eliminated. At Southeastern, each College will handle this responsibility for its own Principal Investigators (PIs), relying on the annual and ad hoc disclosures submitted by faculty as required by Southeastern's [Faculty Policy on Outside Employment](#).

**WHO IS COVERED?**

"Investigator" means all project directors, investigators co-investigators and any other person responsible for the design, conduct or reporting of the research or educational activity proposed for funding, and their spouse and dependent children. It is the responsibility of the PI to ensure all who are subject to the disclosure policy are aware of it; compliance is the individual's responsibility.

**WHAT MUST BE DISCLOSED?**

When proposing a research or educational activity for funding by NSF/PHS (and other agencies that subsequently declare a similar requirement) each investigator must disclose the nature, identity and value of all significant financial interests:

- a) that would reasonably appear to be affected by the specific activity;
- b) in entities whose financial interests would reasonably appear to be affected.

Excluded from disclosure requirement are: Income from seminars, lectures, or teaching engagements sponsored by and service on advisory or review panels for a federal, state, or local government agency, an Institution of higher education as defined at 20 U.S.C. 1001(a), an academic teaching hospital, a medical center, or a research institute that is affiliated with an Institution of higher education.

Investigators also must disclose the occurrence of any reimbursed or sponsored travel (i.e., that which is paid on behalf of the Investigator and not reimbursed to the Investigator so that the exact monetary value may not be readily available), related to their institutional responsibilities; provided, however, that this disclosure requirement does not apply to travel that is reimbursed or sponsored by a federal, state, or local government agency, an Institution of higher education as defined at 20 U.S.C. 1001(a), an academic teaching hospital, a medical center, or a research institute that is affiliated with an Institution of higher education. The Institution's FCOI policy will specify the details of this disclosure, which will include, at a minimum, the purpose of the trip, the identity of the sponsor/organizer, the destination, and the duration. In accordance with the Institution's FCOI policy, the institutional official(s) will determine if further information is needed, including a determination or disclosure of monetary value, in order to determine whether the travel constitutes an FCOI with the PHS-funded research.

**WHAT IS A SIGNIFICANT FINANCIAL INTEREST?**

(1) A financial interest consisting of one or more of the following interests of the Investigator (and those of the Investigator's spouse and dependent children) that reasonably appears to be related to the Investigator's institutional responsibilities:

- (i) With regard to any publicly traded entity, a *significant financial interest* exists 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. For purposes of this definition, remuneration includes salary and any payment for services not otherwise identified as salary (e.g., consulting fees, honoraria, paid authorship); equity interest includes any stock, stock option, or other ownership interest, as determined through reference to public prices or other reasonable measures of fair market value;

(ii) With regard to any non-publicly traded entity, a *significant financial interest* exists if the value of any remuneration received from the entity in the twelve months preceding the disclosure, when aggregated, exceeds \$5,000, or 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

(iii) Intellectual property rights and interests (e.g., patents, copyrights), upon receipt of income related to such rights and interests.

#### **WHAT IS EXCLUDED?**

The term *significant financial interest* does not include the following types of financial interests: salary, royalties, or other remuneration paid by the Institution to the Investigator if the Investigator is currently employed or otherwise appointed by the Institution, including intellectual property rights assigned to the Institution and agreements to share in royalties related to such rights; any ownership interest in the Institution held by the Investigator, if the Institution is a commercial or for-profit organization; income from investment vehicles, such as mutual funds and retirement accounts, as long as the Investigator does not directly control the investment decisions made in these vehicles; income from seminars, lectures, or teaching engagements sponsored by a federal, state, or local government agency, an Institution of higher education as defined at 20 U.S.C. 1001(a), an academic teaching hospital, a medical center, or a research institute that is affiliated with an Institution of higher education; or income from service on advisory committees or review panels for a federal, state, or local government agency, an Institution of higher education as defined at 20 U.S.C. 1001(a), an academic teaching hospital, a medical center, or a research institute that is affiliated with an Institution of higher education."

#### **DISCLOSURE PROCEDURES:**

All investigators must disclose any significant financial interests PRIOR to submission of the proposal to the agency. This form, all appropriate documentation, the proposal, and any other related disclosures and agreements, must be submitted in a sealed envelope marked "CONFIDENTIAL: FINANCIAL DISCLOSURE" and bearing the investigator's and project's name when the proposal is routed for final approval to the Office of Sponsored Research.

#### **RESOLUTION PROCEDURES:**

The disclosure will be reviewed to determine if a significant conflict of interest requiring resolution appears to exist: if so, it will be reviewed by the appropriate oversight mechanism for disposition.