

PITTSBURGH TECHNICAL COLLEGE

FINANCIAL CONFLICT OF INTEREST IN SPONSORED RESEARCH POLICY

Purpose

The Federal Awarding agency must establish conflict of interest policies for Federal awards. The non-Federal entity must disclose in writing any potential conflict of interest to the Federal awarding agency or pass-through entity in accordance with applicable Federal awarding agency policy. [eCFR :: 2 CFR 200.112 -- Conflict of interest.](#)

An additional purpose of this policy is to highlight the requirements of Public Health Service (PHS) regulation [42 CFR Part 50 Subpart F](#) and [45 CFR Part 94](#), which applies to all PHS-supported contracts and agreements, including those issued by the National Institutes of Health (NIH). Furthermore, it complies with the provisions of the [National Science Foundation \(NSF\) Proposal & Award Policies & Procedures Guide, Part II, Award & Administration Guide \(AAG\) Chapter IX.A – Grantee Standards](#), as well as other federal agencies.

Applicability

This policy applies to all PTC (PITTSBURGH TECHNICAL COLLEGE) faculty and staff involved in administering federally sponsored awards.

Disclosure:

All investigators must provide all financial disclosures at the time the proposal is submitted. Also, investigators are required to update those financial disclosures during the period of the award, either on an annual basis or as new reportable significant financial interests are obtained.

Examples of conditions or restrictions that might be imposed to manage, reduce, or eliminate conflicts of interest include, but are not limited to:

- a. public disclosure of significant financial interests;
- b. monitoring of research by independent reviewers;
- c. modification of the research plan;
- d. disqualification from participation in the portion of the externally funded research that would be affected by significant financial interests;
- e. divestiture of significant financial interests; or
- f. severance of relationships that create conflicts.

If the reviewer(s) determine that imposing conditions or restrictions would be either ineffective or inequitable, and that the potential negative impacts that may arise from a significant financial interest are outweighed by interests of scientific progress, technology transfer, or the public health and welfare, then the reviewer(s) may allow the research to go forward without imposing such conditions or restrictions.

Definitions

Financial Conflict of Interest (FCOI): A situation associated with an investigator's participation in a

sponsored project in which it appears, on an actual or potential basis, that the investigator's financial interest could directly or significantly affect the design, conduct, or reporting of the sponsored project.

Designated Official: The PTC official who reviews the investigator's [Significant Financial Interest Disclosure Form](#) to determine if any reported interests appear to represent a conflict of interest. At PTC, this person is the Executive Director of Institutional Advancement, or may be another individual appointed periodically to oversee PTC's compliance in relation to this policy.

Investigator: The principal investigator, the co-principal investigator, or any other person who is responsible for the preparation, conduct, and administration of a research grant, cooperative agreement, training or public service projects, contract, or other sponsored project in compliance with applicable laws and regulations and institutional policy governing the conduct of sponsored research. The investigator also has significant influence over the design, conduct, or reporting of a project. The definition of investigator does not include project participants involved in project tasks who do not otherwise have significant influence on the design, conduct, or reporting of that project.

Non-PTC Investigator: Any person who is responsible for the design, conduct, or reporting of sponsored activities managed by PTC, and who is employed by an entity other than UNF, working pursuant to a subrecipient agreement with another entity, working as an independent contractor or collaborator, or otherwise not employed by PTC.

Sponsored Activity/Project: Includes grants, contracts, cooperative agreements, and other types of agreements, such as training, infrastructure, conference, etc. grants and awards by public or private entities, such as governmental entities, foundations, and corporations.

Subrecipient: A subcontractor, contractor, or collaborator with whom PTC has a written agreement regarding sponsored activity.

Significant Financial Interest (SFI)

Definition: Anything of monetary value belonging to the investigator and his or her spouse or domestic partner and dependent children that could reasonably appear to be related to an investigator's responsibilities for a sponsored project.

SFI Includes:

- *Salary, royalties, or other payments for services*, such as consulting fees or honoraria, unless they are expected to total \$5,000 or less over the next 12 months when aggregated for the investigator and his or her spouse and dependent children.
- *Equity interests*, such as stocks, stock options, or other ownership interests, unless they amount to \$5,000 or less in value and represent a 5% or less ownership interest in a single entity when aggregated for the investigator and his or her spouse and dependent children.
- *Travel payments* (i.e., travel reimbursements or travel paid on the investigator's behalf):
 - For investigators who request or receive any funding from the Public Health Service (PHS), or another federal agency with similar conflict of interest requirements, all travel that is reimburse or sponsored by a third-party sponsor/organizer.
 - For all other investigators, travel that is reimbursed or sponsored by an entity that,

when aggregated, exceeds \$5,000.

- *Intellectual property rights*, such as patents and copyrights, and royalties from these rights.

SFI DOES NOT Include:

- Salary, royalties, or other remuneration from PTC (including payments or other technology commercialization proceeds).
- Any ownership interests in the organization if the organization is an applicant under the National Science Foundation's Small Business Innovation Research Program (SBIR) or Small Business Technology Transfer Program (STTR).
- Income from seminars, lectures, or teaching engagements sponsored by public or nonprofit entities.
- Income from service on advisory committees or review panels for public or nonprofit entities.
- 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, and
 - Does not represent more than a 5% ownership interest in any single entity.
- Salary, royalties, or other payments that, when aggregated for the investigator and the investigator's spouse and dependent children, are not expected to exceed \$10,000 during the prior twelve-month period.

Responsibility

- No faculty or staff members should benefit, or expect to benefit, either directly or indirectly by using or transmitting any information, research results, records, property, etc. which are generated, owned, controlled, or in the custody of PTC and not made generally available.
- No faculty or staff members should undertake any research or projects within PTC with the purpose of serving the needs or interests of an external individual or organization, except in connection with projects financed by the same individual or organization and approved by PTC.
- The Principal Investigator (PI) ensures that all transactions occur within the project period; are properly documented; are reasonable, allocable, allowable, and consistently applied; meet the limitations of the sponsor-approved budget; and occur within the required timeframe for submitting a cost transfer or budget revision.

Pittsburgh Technical College Financial Conflict of Interest Disclosure Form

Name: _____

Position/Title/Department: _____

Date: _____

A. If this is a self-disclosure, please complete this section.

I have no Conflicts of Interest to report. (Please go to Section C).

I do have Conflicts of Interest to report. (Please fill out information below, and then Section C).

Briefly describe any interest, relationship, or transaction that could create a real, apparent, or potential conflict of interest contrary to the requirements or general principals set forth in PTC's Conflict of Interest Policy:

Organization: _____

Your Position: _____

Nature of Business Relationship (please use additional pages as necessary):

B. If you are reporting a suspected, witnessed, or known activity that may constitute a conflict of interest, describe the activity in detail below. Please use additional pages as necessary.

C. I have read PTC's Conflict of Interest Policy. I understand and accept my obligation to disclose in a timely fashion that I or my immediate family might have. The above is an accurate and current representation of my reportable outside interests and activities to the best of my knowledge.

Employee Signature

Date