

Policy on Financial Conflict of Interest

Purpose

This policy outlines Salisbury University ' s (SU) requirements for identifying and managing financial conflicts of interest in research to ensure objectivity in research funded by the U.S. Public Health Service (PHS) and other applicable sponsors. The intent is to promote transparency, integrity, and public trust in the research conducted under SU ' s auspices.

Definitions

- Investigator: Any SU employee responsible for designing, conducting, or reporting research funded by PHS, including collaborators and consultants.
- Significant Financial Interest (SFI): A financial interest consisting of salary, consulting fees, honoraria, equity, or intellectual property income exceeding \$5,000 in value during the 12 months preceding disclosure.
- Financial Conflict of Interest (FCOI): A situation in which SU reasonably determines that an Investigator ' s SFI could directly and significantly affect the design, conduct, or reporting of sponsored research.

Disclosure Requirements

All Investigators are required to disclose to SU ' s Office of Sponsored Programs (OSP) any significant financial interests (SFIs) that may relate to their institutional responsibilities or sponsored research activities. Disclosures must occur:

- At the time of proposal submission or before engaging in research activities.
- Annually during the project period.
- Within 30 days of discovering or acquiring a new SFI.

Review and Decision

The Designated Institutional Official (DIO) or their designee will review each disclosure to determine whether an SFI constitutes a Financial Conflict of Interest (FCOI). If a conflict is identified, a management plan will be developed and implemented to mitigate potential bias in the research. Examples of management strategies include:

- Public disclosure of the FCOI (e.g., in publications or presentations).

- Modification of the research plan.
- Change of personnel or roles within the project.
- Reduction or elimination of the financial interest (e.g., divestiture).
- Severance of relationships that create actual or potential conflicts.

Reporting to PHS

When an FCOI is identified for PHS-funded research, SU will report required information to the PHS Awarding Component prior to the expenditure of funds. Reports will include the nature of the conflict, management strategies, and confirmation that the conflict is being actively managed. Annual updates and new reports will be submitted as necessary throughout the award period.

Enforcement

Investigators who fail to comply with this policy, including disclosure or management requirements, may face sanctions consistent with SU policy and federal regulations. Sanctions may include suspension of research privileges, withdrawal of project participation, or other disciplinary actions as deemed appropriate.

Record Retention

Records of all Investigator disclosures, determinations, and management plans will be maintained by the Office of Sponsored Programs for at least three (3) years from the date of submission of the final expenditures report, or longer if required by the funding agency.

Questions and Contacts

For questions or guidance on this policy, contact the Office of Sponsored Programs, Salisbury University, at (410) 677-0047 or email ttherberger@salisbury.edu.

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