

integrity

*Financial Interest* means anything of monetary value received or held by an Investigator or an Investigator's family, whether or not the value is readily ascertainable, including, but not limited to: salary or other payments for services (e.g., consulting fees, honoraria, or paid authorships for other than scholarly works); any equity interests (e.g., stocks, stock options, or other ownership interests); and intellectual property rights and interests (e.g., patents, trademarks, service marks, and copyrights), upon receipt of royalties or other income related to such intellectual property rights and interests.

For Investigators, *Financial Interest* also includes any reimbursed or sponsored travel undertaken by the Investigator and related to his/her institutional responsibilities. This includes travel that is paid on behalf of the Investigator rather than reimbursed, even if the exact monetary value is not readily available

*Financial Interest* does NOT include:

- a) salary, royalties, or other remuneration from the Institution;
- b)

*Significant Financial Interest* means a Financial Interest that reasonably appears to be related to the Investigator's Institutional Responsibilities, and:

- a) if with a publicly traded entity, the aggregate value of any salary or other payments for services received during the 12

**b) Ad hoc Disclosures**

In addition to the annual disclosure, certain situations require ad hoc disclosure.

When submitting a grant proposal for funding from an external agency, the Investigator must

**Managing Conflicts of Interest**

The information to be made available shall be consistent with the requirements of the policies of the sponsor.

**Regulatory Authority**

This policy implements the requirements of 42 CFR 50 and 45 CFR 94; where there are substantive differences between this policy and the requirements, the requirements shall take precedence.

**Additional Requirements for NIH funded research:**

**Training**

An Investigator must complete training on this policy prior to engaging in research funded by NIH, and at least every four years thereafter. They must also complete training within a