



**Financial Conflict of Interest Policy in U.S. Public Health Service (PHS) and
National Science Foundation (NSF)-Funded Research**

I.

I. **Purpose & Scope**

To

Skidmore College will certify in each application for PHS funding that Skidmore College:

- has in effect an up-to-date written and enforced administrative process to identify and manage FCOIs related to all PHS research projects;
- will promote and enforce Investigator compliance with the PHS FCOI regulation pertaining to disclosure of Significant Financial Interests; and
- will manage FCOIs and provide initial and ongoing FCOI reports to PHS

Skidmore College designates the Director of the Office of Sponsored Research to administer this policy. The Office of the Dean of the Faculty has overall responsibility for this policy. It is the obligation of any Investigator with

PD/PI means a Project Director or Principal Investigator of a PHS-funded research project; the PD/PI is included in the definitions of Senior / Key personnel and Investigator under this subpart.

PHS means the Public Health Service of the U.S. Department of Health and Human Services, and any components of the PHS to which the authority involved may be delegated, including the National Institutes of Health (NIH).

PHS Awarding Component means the organizational unit of the PHS that funds the research that is subject to this subpart.

Public Health Service Act or PHS Act means the statute codified at 42 U.S.C. 201 *et seq.*

Research means a systematic investigation, study or experiment designed to develop or contribute to generalizable knowledge relating broadly to public health, including behavioral and social-sciences research. The term encompasses basic and applied research (e.g., a published article,

2. 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.

3. The term *significant financial interest* does **NOT** include the following types of financial interests:

salary, royalties, or other remuneration paid by Skidmore College to the Investigator if the Investigator is currently employed or otherwise appointed by Skidmore College, including intellectual property rights assigned to Skidmore College and agreements to share in royalties related to such rights;

any ownership interest in Skidmore College 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; and

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.

1. at the time of application for PHS-funded research;
2. no later than thirty days from the date of discovering or acquiring (e.g., through purchase, marriage, or inheritance) a new Significant Financial Interest; and
3. at least annually during the period of award.

The definition of Significant Financial Interest is above in the _____ section of this document.

Investigators also must disclose any reimbursed or sponsored travel (that which is paid on behalf of the Investigator and not reimbursed to the Investigator) related to their Institutional responsibilities. 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 disclosure of reimbursed or sponsored travel must include:

- the purpose of the trip;
- the identity of the sponsor / organizer;
- the

B. Skidmore College Investigators who receive PHS subawards:

If Skidmore College will be a

XII. Sanctions

Note: this section pertains to research funded by both the Public Health Service and the