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Certification:

A confirmation by an Investigator to the DIO that the reporting of his /her Disclosures, or absence of any Disclosures, are up to date.

Conflict of Interest (COI):

When an Investigator is, or may be, in a position to influence activities or decisions in the conduct of externally and applicable internally supported activities in ways that could lead to personal financial gain for the Investigator (and/or the Investigator's Immediate Family Member), or give an improper advantage to third parties in their dealings with the University.

Conflicts of interest may also arise when Investigators (and/or the Investigator's Immediate Family Member) have outside obligations of any kind that are in substantial conflict with the Investigator's University responsibilities or the public interest.

Conflict of Obligation (CO):

A Significant Obligation (SO) that is related to, and that could (or could be perceived to) directly and significantly affect, the design, conduct, or reporting of externally and applicable internally supported activities. The DIO makes the determination that an SO constitutes a CO.

Note: Where a CO exists, the University will not permit cost sharing. The applicable Dean may grant waivers to this policy on a case-by-case basis.

Disclosure:

Report of any outside financial interest or obligation, through Huron Click.

Equity Interest:

Any stock, stock option, or other ownership interest, as determined through reference to public prices or other reasonable measures of fair market value.

Financial Conflict of Interest (FCOI):

A Significant Financial Interest (SFI) that is related to, and that could (or could be perceived to) directly and significantly affect, the design, conduct, or reporting of externally and applicable- internally supported activities. The DIO makes the determination that an SFI constitutes a FCOI.

Note: Where a FCOI exists, the University will not permit cost sharing. The applicable Dean may grant waivers to this policy on a case-by-case basis.

Financial Interest (FI):

1. Any remuneration to the Investigator (and/or those of the Investigator's Immediate Family Member) from outside the University, and/or
2. Any equity holdings or ownerships of the Investigator (and/or those of the Investigator's Immediate Family Member), and/or
3. Intellectual property rights and interests (e.g., new technology disclosures, patents, copyrights) where a company has entered into an option to license, or license, such rights and interests from the University.
4. Intellectual property rights and interests upon receipt of income related to such rights and interests.

Note: At this University, all royalties, including those received by the Investigator from this University, are to be disclosed.

Financial Interest (FI) Exclusions:

- 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, a (United States) 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, a (United States) 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.

Huron Click – Conflict of Interest Module:

The University's electronic system for submitting disclosures and certifications.

Immediate Family Member:

In this Policy, the term "Immediate Family Member" includes the Investigator's spouse, domestic or civil union partner and dependent children.

Institutional Responsibilities:

All professional responsibilities and activities for which the Investigator was hired to perform, and is paid by, this University, includes but is not limited to research, research consultation, teaching, professional practice, institutional committee memberships, and service on panels such as Institutional Review Boards or Data and Safety Monitoring Boards.

Investigator:

Collectively, the persons identified in the Applicability section above.

Management Plan:

A written plan for proactively managing any potential conflicts. The Management Plan typically includes:

- The role and principal duties of the conflicted Investigator in the research project;
- Conditions of the Management Plan;
- How the Management Plan is designed to safeguard objectivity in the research project;
- Confirmation of the Investigator's agreement to the Management Plan;
- How the Management Plan will be monitored to ensure Investigator compliance; and
- Other information as needed.

Obligation:

An unpaid position - held as an officer, trustee, director, advisor, scientific advisor, board member or consultant - of a for-profit or not-for-profit entity.

Publications:

Any public dissemination of research results, including but not limited to: journal articles, poster presentations, or speeches.

Related to an Investigator's Institutional Responsibilities:

An activity (or interest) that relies upon the same expertise that an Investigator uses to carry out his/her Institutional Responsibilities or when it has the potential to influence the duties that University considers part of the work it pays or otherwise engages the Investigator to perform.

Related to an Investigator's Research Project:

Any of the following entities: a supplier of a product or services to the project, a business related to the product or research, a research project sponsor, or any other party that has financial interests tied to the project.

Remuneration:

Salary and any payment for services not otherwise identified as salary (e.g., consulting fees, honoraria, paid authorship).

Reviewer:

Individual members of the COI Committee.

Senior / Key Personnel (PHS / NIH Only):

The PD/PI and any other person identified as senior/key personnel in the grant application or contract, progress report, or any other report submitted to PHS/NIH (including those required by this policy) are Investigators. The PHS/NIH Public Disclosure Requirement pertains specifically to this group of individuals.

Significant Financial Interest (SFI):

One or more of the following types of Financial Interests of the Investigator (and/or those of the Investigator's Immediate Family Member) ***that reasonably appears to be related to the Investigator's Institutional Responsibilities*** is considered an SFI:

Publicly Traded Entity: Value of any remuneration received from the entity in the twelve months preceding the disclosure and/or the value of any equity interest in the entity as of the date of disclosure, when aggregated, exceeds \$5,000.

Non-Publicly Traded Entity: Value of any remuneration received from the entity in the twelve months preceding the disclosure, when aggregated, exceeds \$5,000, and/or the Investigator (and/or the Investigator's Immediate Family Member) holds any equity interest.

Intellectual Property: rights and interests (e.g., patents, copyrights), royalties from such rights, and agreements to share in royalties related to such rights (upon receipt of income related to such rights and interests). At the University, all royalties are to be disclosed, including those received by the Investigator from this University.

Travel (PHS/NIH only): Investigators also must disclose the occurrence (over the preceding 12 months) of reimbursed travel or sponsored travel (i.e., that which is paid on behalf of the Investigator) that is related to their Institutional Responsibilities and which totals > \$5,000 per reimbursing / paying entity. The disclosure must include the sponsor, destination, duration, and purpose of the travel. Excluded from this requirement are travels that are reimbursed or sponsored by 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.

Significant Obligations (SO):

Significant Obligations (SO) includes Obligations that would reasonably appear to be related to an Investigator's Institutional Responsibilities.

Technology Transfer Agreements:

Agreements (e.g. licenses or options to licenses) facilitated by the Office of Technology Licensing and Industry Relations (OTLIR) for University owned intellectual property to outside entities.