

# Conflict of Interest in Research

## Policy Statement

Marywood University extends the applicability of the following regulations to all externally funded projects regardless of funding source: Title 42 of the Code of Federal Regulations, Part 50, Subpart F and the National Science Foundation Grant Policy Manual 510, as amended by 60 FR 35820.

## *Disclosure Required*

Each person participating in a sponsored project covered by this policy must disclose whether or not he or she has external affiliations that may constitute a conflict. A conflict of interest may occur when an employee, officer, or agent who has an affiliation with the external organization meets any one of the following criteria:

- The employee, officer, or agent is an officer, director, partner, trustee, employee, advisory board member, or agent of an external organization or corporation either funding a sponsored project or providing goods and services under a sponsored project on which the employee, officer, or agent is participating in any capacity.
- The employee, officer, or agent is the actual or beneficial owner of more than five percent (5%) of the voting stock or controlling interest of such organization or corporation or voting stock of such organization or corporation that exceeds \$10,000 in value as determined by reference to public prices or other reasonable measures of value.
- The employee, officer, or agent has dealings with such organization or corporation from which he or she expects to receive salary, royalties or other payments of more than \$10,000 during the next twelve months.
- The employee, officer, or agent has immediate family (spouse, parents, parents in-law, siblings, children, or other relatives living at the same address as the faculty/staff member), or the employee, officer, or agent together with all members of his or her immediate family meet any of the criteria stated above.

A disclosure must be completed

- either prior to the University's submission of a proposal for funding or prior to the acceptance of the sponsored project
- or during any sponsored project, whenever the faculty or staff member has a new external affiliation that may constitute a conflict of interest by falling within the criteria stated above.

The disclosure form is initiated by the Office of Research and Sponsored Programs (ORSP). Positive disclosures will be reviewed by the Director of Research and Sponsored Programs in keeping with the current University policies and federal regulations relating to conflict of interest in research and a recommendation made regarding the potential conflict.

**Note:** Certain sponsors, particularly federal agencies, may have requirements that differ from this policy with regard to the timing and frequency of faculty disclosures and other conflict of interest considerations as well. In the case of such discrepancies, the sponsors' requirements will generally prevail.

## *Violations*

Violations of this policy, such as willful concealment of financial interests, may result in sanctions being imposed upon the violating individual. The Director of Research and Sponsored Programs will review allegations of violations and will make recommendations regarding the imposition of sanctions to the Provost.

### ***Records and Confidentiality***

The ORSP shall maintain the records pertaining to each disclosure in strict confidence. Access to such records will be limited to the faculty or staff member, the Provost, the Director of Research and Sponsored Programs, and other University administrators as required by their institutional responsibilities.

### **Definition**

***Conflicts of Interest*** are defined as situations in which employees, officers, and/or agents of the University may have the opportunity to influence the University's business decisions in ways that could lead to personal gain or give improper advantage to members of their families or to associates.

### **Procedures**

See ORSP Conflict of Interest Policy link for forms and procedures: <http://www.marywood.edu/research-office/policies/detail.html?id=248747&crumbTrail=Conflict%20of%20Interest%20in%20Research&pageTitle=University%20Policy:%20Conflict%20of%20Interest%20in%20Research>

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### **Related Policies and Committees**

Policy - Institutional Review of Research Involving Human Participants  
Policy - Educational Training in Human Participants Protection for Investigators  
Policy: - Educational Training in Human Participants protection for IRB Members and IRB Administrative Personnel  
Policy - Animal Subjects in Research and Teaching  
Policy - Educational Training in Animal Research  
Policy - Controlled Substances in Research  
Policy - Educational Training in Responsible Conduct of Research  
University Standing Committee - Institutional Review Board for the Protection of Human Participants

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### **History of the Policy**

02/19/10 – Approved by the President of the University as recommended by the Policy Committee of the University  
10/12/16 – Request from the Office of Research and Sponsored Programs to change the title of a position and the name of the department was approved by the President of the University as recommended by the Policy Committee of the University.

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