



Division: *Academic Affairs*

Classification:

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TITLE	
Conflict of Interest in Sponsored Projects	
POLICY NUMBER	
ASA-03-015	
RESPONSIBLE OFFICER	UNIVERSITY CONTACT
Provost & VP for Academic Affairs	Sponsored Projects Office
SUMMARY	
This Policy establishes Western Oregon University's policy for the disclosure, review, identification, and management of Financial Conflicts of Interest (FCOI) in Sponsored Projects.	
APPLICABLE TO	
This policy applies to Principal Investigators and Co-Investigators of WOU sponsored projects and others defined as an Investigator in accordance with a sponsor's policies.	
DEFINITIONS	
Sponsored Project: A program or activity that is funded by an external agency. The external agencies may include, but are not limited to, federal, state, foundation or other private agencies.	
Disclosures Administrator: The individual(s) designated by WOU's Sponsored Projects Office to solicit, review, and assist in resolving disclosures of financial interest and outside activities in accordance with this policy.	
Significant Financial Interest: Refers to anything of monetary value, including, but not limited to, salary or other payments for services (e.g., consulting fees or honoraria); equity interest (e.g., stocks, stock options or other ownership interests); and intellectual property rights (e.g., patents, copyrights and royalties from such rights).	
Financial Conflict of Interest (FCOI): Refers to a Significant Financial Interest of a researcher that could directly and significantly impact the design, conduct, or reporting of University research, technology transfer, academics, or scholarship.	

Investigator:

The Project Director or Principal Investigator or Co-Investigator, and any other person, regardless of title or position, who is responsible for the design, conduct or reporting of a sponsored project or proposed project, which may include, but is not limited to, students, subgrantees, contractors, consortium participants, collaborators or consultants.

Investigator's Institutional Responsibilities:

An Investigator's professional responsibilities on behalf of WOU, including but not limited to, activities such as research, research consultation, teaching, professional practice, institutional committee memberships, and service on panels such as institutional review boards or data and safety monitoring boards.

Management Plans:

Actions taken by the WOU's Sponsored Projects Office and the Principal Investigator (PI) or Project Director to address a FCOI, which may include reducing or eliminating the FCOI, to ensure, to the extent possible, that the design, conduct and reporting of research will be free from bias.

AUTHORITY**STATEMENT OF AUTHORITY**

This policy establishes the requirements for disclosure of a financial or perceived conflict of interest on sponsored projects at WOU. The policy serves to promote objectivity in sponsored projects by establishing standards that provide a reasonable expectation that the design, conduct, and reporting of externally-funded sponsored projects will be free from bias resulting from investigator conflicts of interest and that external activities do not adversely affect their capacity to meet University responsibilities.

1. Required Disclosures:

Investigators are required to disclose actual or perceived conflicts of interest by submitting WOU's Sponsored Projects conflict of interest disclosure form. WOU's Sponsored Projects office will send Investigators the Conflict of Interest Disclosure form during the pre-award process, after receiving an award, and on an annual basis after being awarded.

2. Disclosure Review:

The University, acting through its Sponsored Projects Office, is responsible for administering a system for collecting disclosures and reviewing disclosures submitted in accordance with this policy. In conducting the review, the Sponsored Projects Office will determine whether the interest or activity reported is related to the Investigator's sponsored project activities and whether the interest or activity constitutes a FCOI or the appearance of a FCOI. The review may be conducted in consultation with the Investigator's unit and divisional leadership as needed. Identified financial conflicts of interest require execution and administration of a Management Plan.

3. Management Plans and Monitoring:

Management Plans will be designed to meet applicable legal requirements, facilitate the local resolution or management of any conflict, and protect the sensitivity of disclosed information. The Sponsored Projects Office and Lead Project Investigator will provide appropriate oversight of identified financial conflicts of interest or conflicts of commitment, and any related management plans with other University officials and offices as circumstances require.

4. Notification to the Sponsor

If the Sponsored Projects Office finds that the Management plan is not being followed or a management plan is not an acceptable solution, the principal investigator in collaboration with the Sponsored Projects Office team will notify the sponsor of the award. Upon notifying the sponsor, all

work that could be in conflict will be paused until the sponsor reviews and provides a determination or guidance indicating that the work may continue.

REFERENCED OR RELATED POLICIES

Uniform Guidance § 200.306 Cost sharing or matching

RELEVANT DOCUMENTS AND LINKS

[2 CFR 215.42 Codes of Conduct](#)

HISTORY

APPROVAL DATE: XX/XX/XXXX

EFFECTIVE DATE: XX/XX/XXXX

LAST UPDATED: XX/XX/XXXX

HISTORICAL DETAIL NOTES: Reviewed by Academic Affairs Executive Committee (August 15, 2023), Staff Senate (September 12, 2023); Faculty Senate (October 10, 2023).

SOURCE:

[NSF Proposal & Award Policies & Procedures Guide \(PAPPG\)](#)

KEYWORDS

Conflict of interest, Sponsored Projects