## State University of New York at Geneseo Disclosure of Financial Interests and Obligations for Non-Public Health Service Sponsors\*

All SUNY Geneseo investigators seeking external funding to conduct scholarly activities are required to complete and file a signed disclosure form before a proposal can be endorsed for submission or prior to establishment of an account in instances where proposal submission is not required prior to award of funds. Certification must always be current, so a new form must be submitted in each reporting year (July 1 – June 30) and its accuracy will be certified for each new proposal submission during that year. During the period of an award, all financial disclosures must be updated as new reportable significant financial interests are obtained. The purpose is to promote objectivity in research by establishing standards to ensure there is no reasonable expectation that the design, conduct, or reporting of research will be biased by any conflicting financial interest of an investigator.

**Specific Instructions:** Complete name and department/school, place a check in the appropriate column for each question and sign at the bottom. If the answer to any question is 'Yes,' please explain in the area below or attach a separate sheet.

Investigator Name:		
Department/School:		
Questions	Yes	No
1. Do you, your spouse or dependent child(ren) hold a position of management (board member, director, officer, partner, trustee, employee or consultant) with a sponsor, vendor or (sub) contractor related to the sponsored program activity?		
2. Do you, your spouse or dependent child(ren) have significant financial interest in a Sponsor, vendor or (sub) contractor related to your sponsored program activity? See definition below for 'significant financial interest'.		
3. If your answer to number 2 is 'yes', is it reasonable to anticipate that your financial interest could be directly and significantly affected by the design, conduct, or reporting of your sponsored program activity?		
Explanation of 'Yes' Items:		
<ul> <li>Investigator Certification:</li> <li>I have read and understood the policy on conflict of interest as well as the Statement and Procedure on the reverse.</li> <li>I agree to file a new or updated disclosure form if the answer to any of the above questions changes.</li> <li>I certify that the answers to the declaration are accurate and truthful to the best of my knowledge.</li> <li>I have been provided, as appropriate, with a copy of Chapter IV A, Award and Administration Guide (NSF).</li> </ul>		
Signature		

## **Definitions:**

**Investigator:** the principal investigator, co-principal investigator, project director, co-project director and any other person, e.g. award manager, who is responsible for the design, conduct or reporting of research or educational activities or for such activities that are proposed for funding. For purposes of these requirements, 'Investigator' includes the investigator's spouse and dependent children.

**Significant financial interest:** 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) <u>valued, when aggregated for the investigator and the investigator's spouse</u> <u>and dependent children, more than \$10,000 or 5% ownership. Salary, royalty or other payments, when aggregated for the investigator and the investigator's spouse and dependent children, must exceed, or be expected to exceed, \$10,000 per year.</u>

**NSF:** National Science Foundation. Applicable policy: Award and Administration Guide Chapter IV A (Grantee Standards, Conflict of Interest Policies).

\*Investigators who have, are applying for, or are participating in, Public Health Service sponsored programs should use the "PHS Significant Financial Disclosure Form" included in the SUNY and Research Foundation of SUNY Policy on Conflicts of Interest in Public Health Service Sponsored Programs.

## Conflict of Interest Statement and Procedures for Non-Public Health Service Sponsors

SUNY Geneseo adheres to the conflict of interest policies of the State University of New York and the Research Foundation of the State University of New York. All investigators must have provided all required financial disclosures at the time a proposal is submitted or prior to the establishment of an award account in instances where proposal submission is not required prior to award of funds. Disclosures must be updated at least annually and as new reportable significant financial interests are obtained.

The Director of Sponsored Research shall serve as the financial disclosure officer. The Director of Sponsored Research, the Provost, the Vice President for Administration and Finance, and the Chair of the Research Council (or the Chair's designee) will review financial disclosures, determine whether a conflict of interest exists, and determine what conditions or restrictions, if any, should be imposed by the institution to manage, reduce or eliminate such conflict of interest.

In terms of sponsored activity, a conflict of interest exists when the Director of Sponsored Research, the Provost, the Vice President for Administration and Finance and the Chair of the Research Council (or their designee) reasonably determine that a significant financial interest could directly and significantly affect the design, conduct, or reporting of the sponsored research or educational activities. Conditions or restrictions that might be imposed to manage, reduce or eliminate conflicts of interest include, but are not limited to: public disclosure of significant financial interests; monitoring of research by independent reviewers; modification of the research plan; disqualification from participation in the portion of the research that would be affected by significant financial interests; divestiture of significant financial interests; or severance of relationships that create conflicts.

If it is determined that imposing conditions or restrictions would be either ineffective or inequitable, and that the potential negative impacts that may arise from a significant financial interest are outweighed by interests of scientific progress, technology transfer, or the public health and welfare, then the research may be allowed to go forward without imposing such conditions or restrictions.

Prior to expenditure of Federal funds, the Director of Sponsored Research will inform the sponsor of any identified conflicting financial interests and will provide assurance that the interest has been managed, reduced, or eliminated in accordance with the regulations. As required, information as to how conflicts have been handled will be made available to the sponsor upon request and subsequently identified conflicts, along with how the conflicts have been managed, reduced or eliminated, at least on an interim basis, will be reported to the sponsor within 60 days of such identification. The Director of Sponsored Research, the Provost, the Vice President for Administration and Finance, and the Chair of the Research Council (or their designee) will be responsible for enforcing the conflict of interest management conditions. The Director of Sponsored Research will notify sponsors, as required, if the institution finds that it is unable to satisfactorily manage a conflict of interest.

If it is determined that an investigator has biased research, the Director of Sponsored Research, the Provost, the Vice President for Administration and Finance, and the Chair of the Research Council (or their designee) will be responsible for the provision of sanctions in accordance with University and Board of Trustees policies and applicable collective bargaining agreements. The Director of Sponsored Research will promptly notify the sponsor, as required, of infractions and of corrective action taken or to be taken. These sanctions will be in addition to any penalties that may be imposed by a cognizant Federal agency for infractions that also violate the terms or conditions of award.

The SUNY System Provost will be notified of any reports regarding conflict of interest that are forwarded to sponsors. Real, apparent, or potential conflicts will be reported to The Research Foundation of SUNY. Records of all financial disclosures and of all actions taken to resolve conflicts of interest will be maintained for at least three years beyond the termination of the grant to which they relate, or until the resolution of any State or Federal agency action involving those records, whichever is longer.