

Addendum to the Conflict of Interest in Sponsored Projects Policy:

Promoting Objectivity in Research

Effective Date: August 24, 2012

Revision Date: August 28, 2018

Responsible University Official: Vice President for Research (VPR)

Institutional Official: Associate Vice President for Sponsored
Projects (AVPSP)

Coordinating Department: Office of Sponsored Project (OSP)

I. APPLICABILITY

- A. This *Addendum to the Conflict of Interest in Sponsored Projects Policy: Promoting Objectivity in Research for which PHS Funding is Sought*, applies to all employees of NAU, and to subgrantees, contractors, consortium participants, collaborators, or consultants, who are planning to participate in, or are participating in, PHS research funding received as a grant, cooperative agreement, or contract.
- B. The revised PHS FCOI regulation is effective August 24, 2012 and applies to each new or continuing PHS grant, cooperative agreement, or contract with a Notice of Award (NoA) that is issued on or after August 24, 2012. For continuing awards, the 2011 regulations will not apply until the next increment of funding is received.
- C. The FCOI Regulations do not apply to PHS-funded Phase I SBIR or STTR funding.
- D. This *Addendum* does not apply to procurements, purchases of goods or services from vendors, or consultant services if the consultant does not meet the definition of an Investigator.

III. SUBRECIPIENT REQUIREMENTS

Subrecipients or Subcontractors performing under an NAU sponsored project must certify that they have in effect a policy which is compliant with the PHS Regulations, or that they will comply with NAU's policy.

IV. PUBLIC ACCESSIBILITY REQUIREMENTS

The OVPR *Conflict of Interest in Sponsored Projects Policy* and this *Addendum* shall be posted on the NAU Research Web site at <https://nau.edu/university-policy-library/research/>.

Prior to expending any sponsored project funds, the Institutional Official shall ensure public accessibility, via a written response within five (5) days business days of a request, of information concerning any

Significant Financial Interest which was disclosed and is still held by the senior/key personnel for the sponsored funded project identified by NAU in the grant application, progress report, or any other required report submitted to the funding awarding agency; which is related to the sponsored funded project; and which is determined to be a FCOI.

NAU will note in its written response that the information provided is current as of the date of the correspondence and is subject to updates, on at least an annual basis and within 60 days of NAU's identification of a new potential FCOI, which should be requested subsequently by the requestor.

Information concerning disclosed SFIs will remain available for responses to written requests for at least five years from the date that the information was most recently updated.

The OVPR Web site will include a contact person's name and mailing or e-mail address where individuals can send in their written request for the above information.

V. INSTITUTIONAL CERTIFICATION

Upon implementation of the policies and procedures outlined in this *Addendum*, NAU will certify, through its Authorized Institutional Official, in each application for PHS funding, that NAU:

- A. Has in effect an up-to-date, written, and enforced administrative process to identify and manage FCOI with respect to all research projects for which funding is sought or received from the PHS
- B. Shall promote and enforce Investigator compliance with the PHS Regulations
- C. Shall manage FCOI and provide initial and ongoing FCOI reports to the PHS awarding component as required
- D. Agrees to make FCOI and SFI information (including related Institutional reviews and determinations) available to HHS, promptly, upon request
- E. Shall fully comply with requirements of the PHS and other sponsor agencies guidelines and applicable regulations

VI. REVISION NOTES

05/11/2017 Revised SFI and COI disclosure process and procedure per revised COISP policy. Replaced references to Office of Grant and Contract Services with the Office of Sponsored Projects. Revised Coordinating Department from Office of Grant and Contract Services to Office of Sponsored Projects. Revised Institutional Official's title.

08/28/2018 Deleted duplicate information that is already contained in the COI in Sponsored Projects policy (COISP).