

# Chicago State University

## FINANCIAL CONFLICT OF INTEREST POLICY

This policy confirms Chicago State University's commitment to the basic values of openness, academic and scholarly integrity, and integrity of business policy and procedure, independence, and safe and ethical research, as well as to its tradition and expectation that employees will conduct their relationships with the University with candor and integrity. To ensure the integrity of all institutional activities, including review and conduct of research involving human and vertebrate animal subjects, and the associated fiscal, contractual and procurement transactions, regardless of the source of support, Chicago State University has elected to apply this Financial Conflicts of Interest policy to all University personnel.

In addition to supporting these basic values, this policy is also designed to:

- Satisfy federal regulations requiring the University to establish and implement policies concerning Significant Financial Interests held by:
  1. Employees or Investigators engaged in research funded by certain federal agencies [e.g., Public Health Services (Title 42 CFR Part 50, Subpart F and 45 CFR Part 94) and the National Science Foundation (Award and Administration Guide)],
  2. Institutional Review Board members (Title 45 CFR Part 46.107(e)), and
  3. Certain personnel involved in research involving human subjects funded by the Department of Health and Human Services.

Such policies allow the University to maintain eligibility for federal funding from the Public Health Service and the National Science Foundation and, in the case of research involving human subjects, funding from any federal agency that is a signatory to the Common Rule (Title 45 CFR 46) when researchers have Significant Financial Interests in research involving human subjects.

- Protect researchers and other employees from misplaced charges of Financial Conflicts of Interest by providing a mechanism for prior objective review and approval of Financial Interests.

Chicago State University acknowledges that employees, and their families and dependents, have the right to acquire, retain and accumulate personal financial assets (including personal income from the transfer of technology or intellectual property subject to University policy) and to establish financial relationships with outside private entities. However, each employee also has the responsibility to manage his or her financial affairs and relationships in a manner that does not interfere with, or improperly influence the performance of, his or her duties and responsibilities as an CSU employee.

Chicago State University will exercise oversight and care in eliminating and managing Financial Conflicts of Interest that do or may arise because of an employee's or an investigator's financial interest in the University activities or research activities. The University will not accept or enter into agreements, contracts, gifts or purchases that give rise to a Financial Conflict of Interest unless the conflict can be eliminated or appropriately managed through administrative oversight to protect the interests of the University. CSU will comply with all reporting responsibilities imposed by the state of Illinois or federal laws or regulations with respect to financial interests that have been disclosed while protecting the personal privacy of employees when possible, except where disclosure is required by applicable law or this policy. The University will comply with all federal and state statutes and regulations requiring reporting of or public access to disclosed individual financial interests and Financial Conflicts of Interest; however, the University will maintain the specific fiscal details of this disclosed financial information as confidential information to the extent allowed by applicable laws or regulations.

In effort of CSU's employees fulfilling his or her responsibilities, and to assist the University in avoiding or managing Financial Conflicts of Interest, each employee and investigator must disclose any known Financial Interests that he, she or a dependent has in any of the following:

1. Any University purchase or procurement of goods or services (whether or not pursuant to a formal contract) or in any investment or loan made by the University.
2. Proposals that are submitted to external sponsors for funding in his or her institutional responsibilities.
3. Protocols for research that are submitted for review and approval by a regulatory committee (or to a subcommittee).
4. Any agreement relating to University technology or other intellectual property that is or will be subject to negotiations between the University and any third person or entity.
5. A donor that contributes a monetary gift or gift-in-kind designated to be in support of the employee's scholarly activities.
6. For an employee who is a member of any regulatory committee, any financial interest that he or she has in any research protocol submitted to that regulatory committee (with the Employee also recusing himself or herself from the review process regarding such protocol).
7. For an employee who is an investigator, any significant financial interest that he or she has not already disclosed as a financial interest.

Such disclosures must be made annually and within 30 days of discovering or acquiring a new Financial Interest.

An employee or Investigator who fails to make disclosures required by this policy, or who otherwise violates any of the provisions in this policy, may be subject to appropriate sanctions, including but not limited to, discipline for misconduct and/or insubordination under the University policies, practices and procedures, up to and including dismissal.

An employee or investigator who disagrees with a decision regarding the existence of as Significant Financial Interest, Financial Conflict of Interest or the necessary elements of a conflict management plan may submit a written appeal to CSU.

Chicago State University encourages faculty authorship of instructional materials and does not discourage the use of such materials in courses in a faculty member's department. In order to prevent Financial Conflicts of Interest or the appearance of such in selecting instructional materials, every academic department or school must have a policy appropriate to its circumstances that ensures instructional materials are selected for their academic merit.

Situations involving Financial Interests also may involve issues addressed in the University's policy on among others. Employees must comply with these and all other applicable policies and regulations.

Tutorial on Financial Conflict of Interest can be located at the following link:

<http://grants.nih.gov/archive/grants/policy/coi/tutorial/fcoi.htm>