CHICAGO STATE UNIVERSITY

GENERAL FINANCIAL CONFLICT OF INTEREST POLICY

Effective Date: September 30, 2026
Responsible Office: Office of Grants and Research Administration
Designated and Institutional Official:
Associate Provost for Grants and Research Administration
Policy Owner: Institutional Official, in consultation with the Provost and General Counsel

Table of Contents

DOCUMENT CONTROL 1

POLICY COMPLIANCE PLAN ***3***

1. PURPOSE ***4***

2. SCOPE AND APPLICABILITY ***4***

2.1 NIH/PHS-Funded Activities **5**

2.2 Sponsor-Specific Requirements **5**

3. DEFINITIONS ***5***

3.1 Covered Individual **5**

3.2 Designated Official **6**

3.3 Financial Conflict of Interest **6**

3.4 Significant Financial Interest **6**

3.5 Management Plan **6**

3.6 Related Financial Interest **6**

4. GENERAL DISCLOSURE REQUIREMENTS ***7***

4.1 Foreign Financial Interests **7**

4.2 Timing of Disclosures **7**

5. REVIEW OF DISCLOSURES ***8***

6. RELATEDNESS AND FCOI DETERMINATION ***8***

7. MANAGEMENT, REDUCTION, AND ELIMINATION OF FCOIs ***9***

8. MONITORING ***9***

9. PUBLIC ACCESSIBILITY ***10***

10. SPONSOR REPORTING ***10***

11. TRAINING REQUIREMENTS ***11***

12. NONCOMPLIANCE AND CORRECTIVE ACTION ***11***

13. CLINICAL RESEARCH REQUIREMENTS ***12***

14. SUBRECIPIENT REQUIREMENTS ***12***

15. PROCUREMENT AND OTHER INTERESTS ***13***

16. RECORDS RETENTION ***13***

17. CONFIDENTIALITY AND INFORMATION SECURITY *13*
18. APPEALS AND RECONSIDERATION *13*
19. POLICY REVIEW AND REVISION *14*
20. POINT OF CONTACT *14*
APPENDIX 1. DOE/NNSA REQUIREMENTS *14*
APPENDIX 2. NSF, NASA, AND OTHER SPONSORS *15*
APPENDIX 3. CMS REQUIREMENTS *15*
APPENDIX 4. FDA CLINICAL STUDIES *16*
APPENDIX 5. ILLUSTRATIVE MANAGEMENT MEASURES *16*
APPENDIX 6. COMPLIANCE RESPONSIBILITIES *16*
Covered Individual **16**
Principal Investigator or Project Director **17**
Designated Official **17**
Institutional Official **17**

Policy Compliance Plan

Chicago State University will implement this policy through the following compliance plan:

1. **Central oversight.** The Associate Provost for Grants and Research Administration will serve as the primary Designated Official.
2. **Mandatory disclosure.** Covered Individuals must disclose Significant Financial Interests at the time of application, annually, and within the required period after acquiring or discovering a new interest.
3. **Sponsor determination.** The applicable sponsor appendix will be identified for every proposal and award.
4. **Relatedness review.** The Designated Official will determine whether a disclosed financial interest is related to the proposed or funded activity.
5. **Management.** When a conflict exists, the University will develop a written Management Plan.
6. **No expenditure before compliance.** Where required, no award funds may be expended until required disclosures have been reviewed and any Management Plan has been accepted and implemented.
7. **Monitoring and reporting.** The University will monitor compliance and submit required reports to the applicable sponsor.
8. **Corrective action.** Untimely disclosure, failure to comply with a Management Plan, or other noncompliance may result in retrospective review, sponsor notification, restrictions on participation, or disciplinary action.

1. Purpose

Chicago State University ("University") is committed to maintaining the integrity, objectivity, and public trust associated with its educational, research, clinical, procurement, outreach, and administrative activities.

The University recognizes that financial interests and outside relationships may create actual, potential, or perceived conflicts of interest that could compromise, or appear to compromise, independent judgment. This policy establishes standards and procedures for identifying, disclosing, reviewing, managing, reducing, or eliminating such conflicts.

This policy is intended to comply with applicable federal and state law and sponsor requirements, including but not limited to regulations issued by the National Institutes of Health (NIH), Public Health Service (PHS), National Science Foundation (NSF), Department of Energy (DOE), National Aeronautics and Space Administration (NASA), Food and Drug Administration (FDA), Centers for Medicare & Medicaid Services (CMS), and other sponsors.

2. Scope and Applicability

This policy applies to Covered Individuals engaged in activities on behalf of the University, including but not limited to:

- Sponsored research;
- Proposals and applications for sponsored funding;
- Research grants, cooperative agreements, and contracts;
- Intellectual property development;
- Procurement and purchasing activities;
- Vendor selection and contract administration;
- Procurement and purchasing decisions;
- Clinical research and clinical studies;
- Technology transfer and licensing;
- Licensing and commercialization activities;
- Institutional review committees;
- Research administration;
- Educational and training activities;
- Product development, testing, or validation;
- Institutional committees and review panels;
- Human-subjects or animal-subjects research;
- Data, model, system, or software development;
- Consulting and collaboration undertaken as part of University responsibilities; and
- Any other activity in which a financial interest could reasonably affect institutional decision-making.

This policy applies to domestic and foreign financial interests, including interests held by the Covered Individual's spouse and dependent children when required by the applicable sponsor or regulation.

2.1 NIH/PHS-Funded Activities

For NIH/PHS-funded research, the University will apply:

- Obtain disclosures no later than proposal submission.
- Obtain annual updates throughout the award period.
- Require disclosure of newly acquired SFIs within thirty (30) days.
- Require FCOI training:
    - Prior to participation;
    - At least every four years;
    - Following substantive policy changes;
    - Upon joining the University; and
    - Following findings of noncompliance.
- Determine whether an SFI constitutes an FCOI before expenditure of funds.
- Implement approved management plans before expenditure of funds.

2.2 Sponsor-Specific Requirements

Sponsor-specific requirements are incorporated through the appendices to this policy, including requirements applicable to:

- Department of Energy and National Nuclear Security Administration;
- National Science Foundation;
- National Aeronautics and Space Administration;
- Centers for Medicare and Medicaid Services; and
- Clinical studies supporting Food and Drug Administration applications.

3. Definitions

A. Covered Individual

A Covered Individual is any person, regardless of title or position, whose University Responsibilities may affect or be affected by a financial interest.

Covered Individuals may include:

- Principal investigators and project directors;
- Senior or key personnel;
- Faculty, staff, and administrators;
- Research personnel;

- Consultants and collaborators;
- Clinical investigators;
- Procurement officials;
- Individuals responsible for research design, conduct, or reporting;
- Individuals responsible for technology transfer or licensing; and
- Any other person designated by the University or sponsor.

B. Designated Official

The Designated Official is responsible for:

- Soliciting and reviewing disclosures;
- Determining whether a financial interest is related to a University activity;
- Determining whether an FCOI exists;
- Developing and approving Management Plans;
- Monitoring compliance;
- Conducting or overseeing retrospective reviews; and
- Submitting required sponsor reports.

The Associate Provost for Grants and Research Administration will normally serve as the Designated Official.

C. Financial Conflict of Interest (FCOI)

A Financial Conflict of Interest, or FCOI, exists when the University reasonably determines that a Significant Financial Interest could directly and significantly affect, or appear to affect, the design, conduct, reporting, administration, oversight, procurement, purchasing, contracting, or other institutional activity.

D. Significant Financial Interest (SFI)

A Significant Financial Interest, or SFI, is a financial interest that reasonably appears to be related to a Covered Individual's Institutional Responsibilities and includes the interests of the Covered Individual, spouse or domestic partner, and dependent children. An SFI includes:

1. Remuneration received from a publicly traded entity during the preceding twelve months and any equity interest in that entity when aggregated and exceeding $5,000.

2. Remuneration received from a non-publicly traded entity during the preceding twelve months that exceeds $5,000.

3. Any equity interest in a non-publicly traded entity, regardless of value.

4. Intellectual property rights and interests, including patents, copyrights, trademarks, licensing agreements, royalties, and other related income.

5. Fiduciary positions, whether compensated or uncompensated, including services such as:

    a. Officer;
    b. Director;
    c. Trustee;
    d. Advisory board member;
    e. Manager; or
    f. Other leadership positions in an external entity.

6. Reimbursed or sponsored travel related to Institutional Responsibilities.

7. Any other financial interest that could reasonably appear to affect or be affected by University activities, including procurement, research, contracting, technology transfer, or compliance activities.

Where sponsor requirements impose lower disclosure thresholds or broader reporting obligations, the more restrictive standard shall govern.

E. Excluded Financial Interests

The following interests are not considered Significant Financial Interests unless otherwise required by applicable law or sponsor requirements:

a. Salary, royalties, or other remuneration paid by the University.

b. Income from seminars, lectures, teaching engagements, or training activities sponsored by:

    i. Federal agencies;
    ii. State agencies;
    iii. Local governmental agencies;
    iv. Institutions of higher education;
    v. Academic teaching hospitals;
    vi. Medical centers; or
    vii. Research institutes affiliated with institutions of higher education.

c. Income received from services on advisory committees, peer-review panels, accreditation teams, or governmental review boards.

d. Income derived from authorship of scholarly, educational, or academic works.

e. Mutual funds, pension funds, retirement accounts, and similar investment vehicles where the Covered Individual does not directly control investment decisions.

f. Travel reimbursed or sponsored by:
    i. Federal agencies;

ii. State agencies;
iii. Local governmental agencies;
iv. Institutions of higher education;
v. Academic teaching hospitals;
vi. Medical centers; or
vii. Research institutes affiliated with institutions of higher education.

F. Management Plan

A Management Plan is a written document specifying the actions required to manage, reduce, or eliminate an FCOI.

G. Related Financial Interest

A financial interest is related to a University activity when the Designated Official reasonably determines that:

- The activity could affect the financial interest; or
- The financial interest is held in an entity whose financial interests could be affected by the activity.

4. General Disclosure Requirements

Covered Individuals must disclose Significant Financial Interests related to their University Responsibilities:

- Upon hire or appointment;
- Prior to proposal submission;
- Prior to participation in covered activities;
- Annually thereafter;
- Within thirty (30) days of discovering or acquiring a new Significant Financial Interest; and
- Whenever otherwise required by sponsor terms or University procedures.

A disclosure must include sufficient information for the University to determine:

- The identity of the entity;
- The nature of the financial interest;
- The relationship of the interest to the Covered Individual's University Responsibilities;
- The approximate value or applicable value range;
- The date and source of the interest;
- Relevant travel, compensation, equity, intellectual property, or ownership information; and
- Any additional information required by the sponsor or University.

4.1 Foreign Financial Interests

Covered Individuals must disclose qualifying financial interests received from foreign entities, including:

- Foreign institutions of higher education;
- Foreign governments;
- Foreign companies;
- Foreign nonprofit organizations;
- Foreign sponsors of travel;
- Foreign seminars, lectures, or teaching sponsors; and
- Foreign advisory committees or review panels.

5. Retrospective Review

When the University identifies a previously undisclosed or unmanaged FCOI involving sponsored activities, the Designated Official shall:

1. Complete an initial review within sixty (60) days;
2. Implement interim management measures as appropriate; and
3. Complete a retrospective review within one hundred twenty (20) days of the noncompliance determination.

The retrospective review shall evaluate whether bias occurred in the design, conduct, reporting, oversight, procurement, or administration of the affected activity and shall be documented consistently with sponsor requirements.

6. Mitigation Reports

If a retrospective review identifies bias or other material impact, the University shall promptly notify provide any required mitigation report to the sponsor.

The mitigation report may include:

- Findings of the review;
- Nature and extent of bias;
- Effect on affected activities;
- Corrective actions implemented;
- Planned preventative measures; and
- Any additional information required by applicable regulations.

7. Review of Disclosures

The Designated Official will review each disclosure to determine whether:

1. The disclosed item is an SFI;
2. The interest is related to the Covered Individual's University Responsibilities;
3. An FCOI exists;
4. A Management Plan is required; and
5. Sponsor or regulatory reporting is required.

Complex matters may be referred to a Conflict-of-Interest Review Committee.

No funding may be expended on activities subject to sponsor review requirements until all identified conflicts have been appropriately addressed.

The Designated Official may consult with:

- The Covered Individual;
- The principal investigator or project director;
- The department chair or dean;
- The Institutional Review Board;
- The Institutional Animal Care and Use Committee;
- Procurement officials;
- The Office of General Counsel;
- Research compliance personnel; and
- Independent reviewers.

8. Relatedness and FCOI Determination

An SFI is related to an activity when the Designated Official reasonably determines that:

- The activity could affect the entity or interest; or
- The entity's financial interests could be affected by the activity.

An FCOI exists when the Designated Official determines that the related SFI could directly and significantly affect:

- The design, conduct, or reporting of research;
- The safety or welfare of research participants;
- A procurement decision;
- The integrity of a clinical study;
- Technology transfer or licensing;
- The selection of a vendor or subcontractor; or
- Another University decision or activity.

9. Management, Reduction, and Elimination of FCOIs

When an FCOI is identified, the Designated Official will develop a written Management Plan appropriate to the circumstances.

Management measures may include:

- Public disclosure of conflicts;
- Disclosure to research personnel
- Independent monitoring;
- Disclosure to the Institutional Review Board;
- Disclosure to research participants;
- Appointment of an independent monitor;
- Independent review of data or analysis;
- Modification of the research or project plan;
- Modification of the Covered Individual's duties;
- Removal from selected activities;
- Restrictions on access to data or decision-making;
- Recusal from procurement decisions;
- Independent verification of results;
- Divestiture of interests or equity;
- Reduction or elimination of financial interests;
- Prohibit action from participation in specific events;
- Severance of the conflicting external relationship(s); and
- Termination of the activity or relationship.

Each Management Plan must identify:

- The Covered Individual;
- The affected project or activity;
- The entity or interest creating the conflict;
- The nature of the conflict;
- Required management measures;
- Responsible monitoring officials;
- Reporting requirements;
- The effective date;
- Review requirements; and
- Consequences of noncompliance.

10. Monitoring

The University will monitor compliance with each Management Plan for the duration of the award or activity.

Monitoring may include review of:

- Publications and presentations;
- Informed consent documents;
- Procurement records;
- Travel disclosures;
- Compensation records;
- Recusal documentation;
- Independent monitor reports; and
- Other evidence of compliance.

The Designated Official may revise a Management Plan when the financial interest, project scope, Covered Individual's role, sponsor requirements, or other relevant circumstances change.

11. Public Accessibility

Where required by federal regulations or sponsor terms, the University will make its FCOI policy publicly available.

For NIH/PHS-funded research, the University will respond to requests concerning identified FCOIs within five (5) business days.

Publicly available disclosures may include:

- Investigator's name;
- Investigator's title and role;
- Name of the external entity;
- Nature of the financial interest; and

Approximate dollar value or value range, or a statement that the value cannot readily be determined.

12. Sponsor Reporting

The University shall submit reports required by sponsors within applicable regulatory deadlines.

For NIH/PHS-funded projects, reports shall include:

- Grant or contract number;
- Principal Investigator information;

- Name of conflicted investigator;
- Nature of the conflict;
- Value or value range of the financial interest;
- Relationship of the conflict to the funded activity;
- Basis of the University's determination;
- Management Plan elements;
- Status of the conflict; and
- Changes to the Management Plan.
- Initial FCOI reports;
- Reports for newly identified FCOIs;
- Annual reports;
- Revised reports;
- Retrospective-review reports; and
- Mitigation reports.

The University shall submit annual updates and revised reports whenever required by applicable regulations.

13. Training Requirements

All investigators participating in federally sponsored research shall complete conflict-of-interest training as required by applicable sponsor regulations.

For NIH/PHS-funded activities, Covered Individuals must complete FCOI training:

- Before participating in covered sponsored activities;
- At least once every four years;
- When this policy is substantially revised;
- When the individual becomes newly subject to the policy;
- Appointment by the University;
- Within 30 days when required because findings of noncompliance; and
- Within any shorter period required by a sponsor.

Training must address disclosure requirements, sponsor thresholds, Management Plans, public accessibility, clinical research, procurement conflicts, subrecipient responsibilities, and consequences of noncompliance.

14. Noncompliance and Corrective Action

Noncompliance includes:

- Failure to disclose an SFI;
- Late or incomplete disclosure;
- Failure to update a disclosure;
- Failure to complete required training;

- Failure to comply with a Management Plan;
- Failure to recuse when required;
- Failure to disclose a conflict in a publication or consent document;
- Failure to monitor or report a conflict; and
- Failure to provide requested documentation.

The University may require:

- Retrospective review;
- Mitigation;
- Additional monitoring;
- Mandatory training;
- Restrictions on participation;
- Removal from a project;
- Suspension or restriction of funds;
- Sponsor notification;
- Corrective action under employment policies; and
- Other remedies permitted by law or University policy.

15. Clinical Research Requirements

Clinical investigators participating in studies supporting applications to the Food and Drug Administration must provide complete and accurate financial disclosures before participating in the study.

Disclosures must address:

- Compensation;
- Equity interests;
- Proprietary interests;
- Ownership interests;
- Financial arrangements;
- Consulting relationships;
- Intellectual property interests; and
- Other interests required under 21 CFR Part 54.

The University may require disclosure to the FDA, independent monitoring, modification of duties, removal from the study, divestiture, or termination of a financial arrangement.

16. Subrecipient Requirements

Every written sub recipient agreement shall specify whether the subrecipient's conflict-of-interest policy or the University's policy applies.

The subrecipient must notify the University of identified FCOIs within the time required by the agreement and must provide enough information for the University to meet sponsor reporting deadlines.

17. Procurement Conflicts

Covered Individuals with a financial interest involved in procurement must disclose financial interests involving:

- Vendors;
- Contractors;
- Consultants;
- Suppliers;
- Parent companies;
- Affiliates; and
- Subsidiaries.

A person with a procurement conflict must not participate in procurement planning, solicitation development, bid evaluation, vendor selection, negotiation, contract administration contract approval, invoice approval, or vendor oversight unless an approved Management Plan permits participation.

18. Records Retention

The University will maintain records of conflict-of-interest disclosures, review records, determinations, Management Plans, monitoring, training, sponsor reports, retrospective reviews, mitigation reports, and corrective actions for at least five (5) years following submission of the final expenditure report, or longer if required by:

- Sponsor terms;
- Audits;
- Litigation holds;
- Investigations;
- Government actions; or
- Applicable law.

19. Confidentiality And Information Security

Financial disclosures and related records will be treated as confidential institutional records.

The University may disclose information to sponsors, federal or state agencies, institutional review bodies, or other authorized parties when required by law, regulation, sponsor terms, or institutional responsibilities.

20. Appeals and Reconsideration

Covered Individuals may request reconsideration of a determination or Management Plan by submitting a written request to the Provost or Institutional Official within thirty (30) days.

The request should identify:

- The decision being challenged;
- The factual or procedural basis for reconsideration;
- Supporting documentation; and
- The requested resolution.

A request for reconsideration does not suspend the Management Plan unless the Provost or Institutional Official issues a written suspension.

The Provost or Institutional Official's decision shall constitute the final University determination.

21. Policy Review and Revision

This policy will be reviewed at least every four years and sooner when:

- Federal regulations change;
- Sponsor requirements change;
- An audit identifies a deficiency;
- The University changes its organizational structure; or
- Experience demonstrates that revisions are necessary.

22. Point of Contact

Associate Provost for Grants and Research Administration
Chicago State University
9501 South King Drive, ADM 303
Chicago, Illinois 60628
Email: egarcia@csu.edu

23. Regulatory Authority

This policy shall be interpreted consistently with applicable federal and state requirements, including but not limited to:

- 42 CFR Part 50;
- 45 CFR Part 94;
- NSF Proposal and Award Policies;
- DOE and NNSA conflict-of-interest requirements;
- FDA regulations;
- CMS requirements; and
- Other applicable sponsor regulations.

Where sponsor requirements are more restrictive than this policy, the sponsor requirements shall control.

24. Waivers

For activities not subject to mandatory federal conflict-of-interest requirements, the Institutional Official may grant a written waiver when:

- The financial interest is minimal;
- The interest is unlikely to affect objectivity;
- Sufficient safeguards exist to protect institutional integrity; and
- The waiver is consistent with applicable law and University interests.

Conditions may be imposed as part of any waiver approval

Appendix 1. DOE/NNSA Requirements

This appendix applies to Department of Energy and National Nuclear Security Administration awards.

An SFI includes qualifying remuneration, equity interests, intellectual property income, and reimbursed or sponsored travel related to University Responsibilities.

For publicly traded entities, an SFI generally exists when the aggregate value of remuneration and equity exceeds $5,000.

For non-publicly traded entities, an SFI generally exists when:

- Aggregate remuneration exceeds $5,000; or
- The Covered Individual, spouse, or dependent child holds any equity interest.

Covered Individuals must disclose qualifying intellectual property income and sponsored or reimbursed travel.

Appendix 2. NSF, NASA, and Other Sponsors

This appendix applies to NSF, NASA, and sponsors without separate FCOI regulations or PHS requirements.

An SFI may include:

- Salary;
- Consulting fees;
- Honoraria;
- Equity;
- Stock options;
- Venture or capital financing;
- Patents;
- Copyrights; and
- Royalties.

Applicable exclusions and thresholds must be applied in accordance with the sponsor's award terms. If a sponsor establishes a lower or broader threshold, the sponsor requirement controls.

Appendix 3. CMS Requirements

This appendix applies to CMS awards.

An SFI may include salary, consulting fees, honoraria, equity interests, stock, stock options, ownership interests, patents, copyrights, and royalties.

An Other Interest exists when a relationship with a parent company, affiliate, or subsidiary causes the University to be unable, or appear unable, to act impartially in a procurement action.

Where required by CMS, the conflict must be eliminated before CMS funds are spent on the affected activity.

Appendix 4. FDA Clinical Studies

This appendix applies to clinical studies supporting FDA applications for:

- New drugs;
- Biological products;
- Medical devices; and
- Other products covered by 21 CFR Part 54.

Clinical investigators must provide complete financial disclosures before participating in the study. The University may require independent monitoring, modification of responsibilities, removal from the study, divestiture, or other corrective action.

Appendix 5. Illustrative Management Measures

Conflict circumstance	Possible management measure
Equity in a sponsor or vendor	Divestiture, recusal, independent review, or removal from the activity
Consulting income from an affected company	Disclosure, limitation of duties, independent monitor, or termination of consulting
Royalty interest in a product being tested	Public disclosure, independent data analysis, divestiture, or removal from reporting
Sponsored travel from an affected entity	Disclosure, recusal, or prohibition on related decisions
Procurement relationship with a vendor	Recusal from solicitation, evaluation, negotiation, and approval
Conflict involving human-subjects research	Disclosure in informed consent and independent safety monitoring
Conflict involving a clinical study	FDA-compliant disclosure, independent monitoring, or investigator replacement
Conflict that cannot be adequately managed	Elimination of the interest or termination of the activity

Appendix 6. Compliance Responsibilities

Covered Individual

The Covered Individual must:

- Disclose all required interests accurately and completely;
- Update disclosures on time;
- Complete required training;
- Comply with Management Plans;
- Recuse when required;
- Disclose conflicts in publications and presentations when required; and
- Cooperate with reviews and audits.

Principal Investigator or Project

Director The PI or PD must:

- Ensure that project personnel understand disclosure requirements;
- Prevent participation before required approvals;
- Implement project-level controls;
- Notify the Designated Official of suspected noncompliance; and
- Support monitoring.

Designated Official

The Designated Official must:

- Review disclosures;
- Determine relatedness and FCOI status;
- Develop Management Plans;
- Monitor compliance;
- Conduct or oversee retrospective reviews;
- Maintain records; and
- Submit required sponsor reports.

Institutional Official

The Institutional Official must:

- Provide central oversight;
- Resolve escalated matters;
- Ensure consistency among sponsor requirements;
- Approve institutional procedures;

- Coordinate with General Counsel; and
- Ensure periodic policy review.