



## Conflict of Interest Policy and Disclosure Statement

Financial Conflict of Interest (FCOI) means a significant financial interest that could directly and significantly affect the design, conduct, or reporting of PHS-funded research. (Federal Regulations, 8/12). It is Albright College's responsibility to ensure that faculty/staff disclose their **current, potential and/or appearance of a conflict of interest** when seeking external funding.

### 1. Scope

This conflict of interest policy applies to Principal Investigators (PIs) who are seeking external funding, whether this funding is from federal, state, local or private sources.

### 2. Responsibilities

PIs may be involved in the affairs of other institutions, organizations and businesses. Such relationships may be perceived as conflicts of interest. Although most such potential conflicts are inconsequential, each PI is responsible for informing the college and the potential funder of situations that involve personal, familial or business relationships that could create conflicts regarding their research project. Albright College requires a Conflict of Interest Disclosure statement from each PI prior to the application for external funding. The form must be updated annually or whenever a new conflict emerges. The statement discloses any personal, familial or business relationships that reasonably could give rise to a conflict involving Albright College, and it acknowledges compliance with the letter and spirit of this policy.

### 3. Disclosure

Please list on this form those substantive relationships that you or members of your family maintain with organizations that do business with Albright College or that are connected to your research. Please also list any other relationships that could be construed to potentially bias your judgment. In addition to this form, it is appropriate to disclose to the funding agency any current or potential conflict of interest within your proposal narrative.

In the event you are uncertain as to the appropriateness of listing a particular relationship, the Provost of the College should be consulted. He/she may then elect to consult with the President or legal counsel. Such information, including information provided on this form, shall be held in confidence except when, after consultation with you, disclosure is appropriate.

The following definitions are provided to help you decide whether a relationship should be listed on this form:

- Family Member: A spouse, parents, siblings, children or any other relative who resides in your household.
- Business Relationship: One in which you or a member of your family serves as an officer, director, employee, partner, trustee, or controlling stockholder of an organization that does substantial business with Albright College.
- The Public Health Service (PHS) defines "significant financial interest" as follows: "*Significant Financial Interest*" means anything of monetary value, including but not limited to, salary or other payments for services (e.g., consulting fees or honoraria); equity interests (e.g., stocks, stock options or other ownership interests); and intellectual property rights (e.g., patents, copyrights and royalties from such rights)."
- Substantial benefit: You or a member of your family are the actual or beneficial owner of more than 5 percent of the voting stock or controlling interest of an organization that does substantial business with Albright College, or is involved in the proposed research, or you or a member of your family have other direct or indirect dealings with an

organization from which you or a member of your family benefits directly, indirectly, or potentially from cash or property receipts totaling \$5,000 or more annually.

**4. Training**

Investigators about to submit a grant to NIH are also required to complete Modules 1 and 2 of the [Conflict of Interest Mini-Course developed by the Collaborative Institutional Training Initiative \(CITI\)](#). Investigators applying for funding from NSF or any other federal agency are strongly encouraged to take the CITI mini-course. Once you have completed the course, print the completion certificate and send to the Director of Corporate & Foundation Relations to be kept on file.

**Conflict of Interest Disclosure Statement**

Please complete the following statement and return this form to the Director of Corporate & Foundation Relations prior to submitting your application for funding.

1. Are you aware of any relationships between Albright College and you or a member of your family that may represent a conflict of interest as defined by the letter or spirit of this policy?

- Yes  
 No

If Yes, please list or elaborate such relationships and the details of annual or potential financial benefits as you can best estimate them.

2. Did you or a member of your family receive, during the last 12 months, any gifts or loans from any source with which Albright College has significant business dealings?

- Yes  
 No

If Yes, please list such loans or gifts, their source and their approximate value.

I certify that the foregoing information is true and complete to the best of my knowledge.

Signature \_\_\_\_\_

Date \_\_\_\_\_