

Addendum to Policy - updated August 24, 2012

Addendum to Policy on Disclosure of Investigator Significant Financial Interests Related to Sponsored Projects for Research funded by the United States Public Health Service and sponsors requiring adherence to PHS rules

This Addendum modifies the requirements for disclosure of financial interests related to sponsored projects for submission of proposals to, and conduct of sponsored research funded by, the United States Public Health Service (PHS) and any sponsor requiring adherence to PHS rules on disclosure of financial conflicts of interest.

Background

In contrast with general requirements for sponsored research, PHS rules require

- a threshold minimum of \$5,000 for a source of income to give rise to a financial conflict of interest requiring reporting and elimination or management.
- that each Investigator (each individual having a substantial financial interest in a commercial entity that has a substantial interest in the research) must disclose the financial interest to the PHS and the sponsor.

Policy

1. Upon submission of a proposal to PHS or to any sponsor requiring compliance with PHS rules on financial conflicts of interest, each of the listed Key Personnel and each person having independent responsibility for the design, conduct or reporting of results of a project must provide to the Office of Research and Sponsored Programs a completed PHS-Funded Project Financial Interests Report, following the instructions and applying the definitions provided on the reporting form. The reporting form must be re-filed annually or within 30 days of occurrence of any change in any of the responses.

2. Upon submission of a proposal to PHS or to any sponsor requiring compliance with PHS rules on financial conflicts of interest, each of the listed Key Personnel and each person having independent responsibility for the design, conduct or reporting of results of a project must have successfully completed training in the PHS rules as designated by the Director of the Office of Research and Sponsored Programs, and must provide evidence of successful completion to the Office of Research and Sponsored Programs.

3. The Director of the Office of Research and Sponsored Programs, in consultation with the Director of Internal Audit will review the responses and desearc Auditi Office5ceaficef1 0 0 13(f)-11(fs)3/3(S)-4(rf i)4(nt)-3(e3(e)-10(p