

Conflict of Interest – Frequently Asked Questions

...the Who, What, When, Where, and Why of TLU's CoI Policy

Who needs to disclose?

Any TLU employee, regardless of title or position, who is responsible for the design, conduct or reporting of research and educational activities funded by an external sponsor or proposed for such funding.

The employee must disclose Significant Financial Interests (SFI)'s for themselves, AND for his/her spouse or dependent children as well.

What information do I disclose?

If you or your spouse or dependent children have any of the following that reasonably appear to be related to your institutional responsibilities, you must disclose it:

- Equity interest, remuneration or any combination of the two for any publicly or non-publicly traded entity that when aggregated exceeds \$5000.
- ANY equity interest in a non-publicly traded entity
- Intellectual property rights and interests upon receipt of income
- ALL reimbursed or sponsored travel related to institutional responsibilities, including purpose of the trip, identity of the sponsor, destination, and duration - UNLESS the travel was paid for by a Federal, State or local government agency, or an Institution of Higher Education (IHE) or an academic teaching hospital, medical center or research institute affiliated with an IHE.

When do I disclose?

- Annually at the beginning of each Academic Year
- Prior to submitting a proposal application, if you have not disclosed previously
- Prior to conducting PHS funded research, if you have not disclosed previously
- Any time a Significant Financial Conflict of Interest arises

Where/How do I disclose?

Annually - At the beginning of each Academic Year, you will be provided a form to disclose, or certify nothing to disclose. The form will be collected by the Grant Analyst.

Prior to Submitting a PHS application – If necessary, the Director of Corporate and Foundation Relations will provide you with a disclosure form to complete before the proposal is submitted.

Prior to conducting PHS funded research – If necessary, the Grant Analyst will provide a disclosure form to Investigators who have not yet disclosed, prior to their conducting research activity on a PHS funded project.

You may request a CoI disclosure form at any time by emailing grants@tlu.edu.

Why do we have to disclose potential CoI's?

Disclosure is necessary because TLU has a responsibility to promote objectivity in the conduct of sponsored programs and to remain in compliance with federal and state requirements. CoI disclosure not only demonstrates financial stewardship, it also is required prior to accepting most federal grants.