

# CONFLICT OF INTEREST IN RESEARCH POLICY

SLT 3.4

**Date of Last Update:**

December 22, 2016

**Approved By:**

- Senior Leadership Team

**Responsible Office:**

Center for Scholarly and Creative Excellence

## POLICY STATEMENT

The University is committed to transparency, integrity of scholarship, and independence as it pursues its mission to create, preserve, and disseminate knowledge through teaching, research, and public service. Accordingly, Grand Valley State University allows and encourages faculty and staff to engage in outside activities and relationships that enhance the mission of the University. All faculty and staff members are to act with honesty, integrity, and in the best interest of the University when performing their duties, and to abide by the highest standards of research, educational, professional, and fiscal conduct.

External sponsors, whether governmental or private, institute conflict of interest regulations of their own for investigators seeking research funding. The purpose of such regulations is to promote objectivity in research and to provide a reasonable expectation that the design, conduct and reporting of sponsored research will be free from bias arising from Financial Interests of participating investigators. As a recipient of external funding from governmental and nongovernmental sponsors, the University must comply with these regulations. Similarly, investigators engaged in research on human subjects will be expected to comply with the Conflict of Interest (COI) provisions of the University's Human Research Review Committee (HRRC) whether the research is funded from external sources or not.

No research, sponsored program, or technology transfer activities occurring at the University shall be adversely affected by the financial interests of the University personnel carrying out those activities. Prior to participating in a research, sponsored program, or technology transfer activity, University personnel having a potential conflict of interest shall disclose the details to the University. The Research Integrity Officer at the University shall be responsible for reviewing the disclosures and instituting an adequate plan for the management of any

potential financial conflict of interest.

If any application for external funding is involved, faculty and staff investigators shall ensure that they have disclosed all Significant Financial Interests related to their University Responsibilities prior to submitting the application, and as soon as possible thereafter if a new Significant Financial Interest meeting the disclosure standard arises. Disclosures shall also be updated as soon as possible, but within 30 days, when an existing Significant Financial Interest ends or changes in a material way.

Faculty and Staff investigators funded by the Public Health Service (PHS) and/or other agencies that abide by PHS COI regulations are subject to additional requirements in accordance with 42 C.F.R. Part 50.601. Investigators involved in research funded by PHS sponsors must complete required conflict of interest training before engaging in research and every four years thereafter. GVSU may require training more frequently than every four years if there is a substantive conflict of interest change or specific instances of noncompliance.

This policy fulfills federal regulations requiring institutions receiving federal funding to have in place a written, enforced policy and process to identify and manage, reduce, or eliminate conflicts of interest of persons engaged in the design, conduct, or reporting of federally funded research.

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