

Conflict of Interest Policy

The disclosure of financial conflicts of interest is intended to promote objectivity in research. The requirements for disclosure may vary from sponsor to sponsor with the most stringent requirements (CFR 42 Part 50, Subpart F) for Public Health Service (PHS) entities including NIH, AHRQ, FDA, and others. The Federal Demonstration Partnership website maintains a list of PHS entities and applicants.

Dordt University investigators should verify the inclusion of PHS regulation in their award terms.

Definition

For the purposes of this policy, significant financial interest is defined as any financial interest that includes

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All investigators must complete FCOI training either using CITI or the NIH training module (https://grants.nih.gov/grants/policy/coi/tutorial2018/story_html5.htm) prior to receipt of any PHS/NIH funded grant and every four years thereafter in the following situations: 1) the policy changes in a way that would impact investigators, 2) a new investigator joins that Dordt faculty with PHS/NIH funding, or 3) an investigator is determined not to be in compliance with this policy.

Implementation

Disclosure, Review and Monitoring: The Director of the Kielstra Center will ensure that an Investigator's significant financial interest disclosures are reviewed no later than at the time of application for PHS funded research, at least annually during the period of the award, and within 30 days of discovering or acquiring a new SFI.

Reporting: The Director of the Kielstra Center will submit initial, annual, and ongoing FCOI reports via eRA Commons following guidelines for reporting in 42 CFR 50.605. Reporting is required prior to new funding expenditures, within sixty (60) days of the addition of a new investigator, receipt of new disclosures, or identification of previously undisclosed or not reviewed significant financial interests.

All FCOI records will be maintained for three years from the date of the final expenditures report or other timeframes, if required (45 CFR 75.361).

The Kielstra Center will incorporate language related to FCOI in subrecipient agreements that establish FCOI policy (establish whether the Dordt University FCOI policy or that of the subrecipient will apply to the subrecipient investigator and establish reporting timelines, as needed).

The VPAA and Director of Human Resources and Organizational Development will be notified whenever an FCOI management plan is implemented and will implement any necessary or administrative actions to ensure compliance with the management plan.

This FCOI policy is posted to the Dordt University grant website and requests for additional information about FCOI held by senior/key personnel will be made available to staff within five (5) business days.