

**JACKSONVILLE STATE UNIVERSITY**  
**Manual of Policies and Procedures**

**POLICY NUMBER: I:01:15**

**DATE: May 2013**

**REVISION/REVIEW DATES: November 2018 , May 2026**

**SUBJECT: Financial Conflict of Interest for Sponsored Projects**

**APPROVED: Dr. Don C. Killingsworth, Jr., President**

**PURPOSE**

Reflecting the belief of Jacksonville State University (JSU) that maintaining objectivity in research is vital and that all research must be conducted with the highest ethical standards, in a manner assuring the integrity of the research, this policy ensures a reasonable expectation that the design, conduct, or reporting of research will not be biased by any financial interest of a Principal Investigator (PI)/Project Director (PD) and/or a JSU employee. This policy and accompanying procedures are designed specifically to meet the requirements of Federal regulations governing Investigator financial conflicts of interest ([42 CFR Part 50 Subpart F](#) for Grants and Cooperative Agreements, [45 CFR Part 94](#) for Contracts, and [2 CFR 200.112](#)).

**POLICY**

Designed to ensure appropriate management of actual or potential financial conflicts of interest, this policy, like the federal regulations on which it is based (especially the NIH and NSF), promotes objectivity in research. The policy establishes standards which ensure that no reasonable expectation of bias by any conflicting financial interest of an Investigator (see [45 CFR 50.601](#)) would occur in the design, conduct, or reporting of research funded under federal grants.

**DEFINITIONS**

Significant Financial Interest is defined as one or more of the following interests of the Principal Investigator/Project Director or JSU grant employee (and those of the PI's/PD's or JSU sponsored program employee's spouse, domestic partner or dependent children) listed below, if the interest reasonably appears to be related to the PI's/PD's or JSU sponsored program employee's institutional responsibilities, including all research, teaching and/or service to JSU:

- Regarding any publicly traded entity, a Significant Financial Interest exists if the value of any remuneration received from the entity in the 12 months preceding the disclosure and the value of any equity interest in the entity as of the date of disclosure, when aggregated, exceeds \$5,000. Remuneration includes any salary and any payment for services not otherwise identified as salary (e.g. consulting fees, honoraria, paid authorship); equity interest includes any stock, stock option, or other ownership interest, as determined through reference to public prices or other reasonable measures of fair market value.
- Regarding any non-publicly traded entity, a Significant Financial Interest exists if the value of any remuneration received from the entity in the 12 months preceding the disclosure, when aggregated, exceeds \$5,000, or when the PI/PD or JSU grant employee (or those of the PI's/PD's or JSU grant employee's spouse, domestic partner or dependent children) owns any equity interest, regardless of dollar value.
- Intellectual property rights and interests (e.g. patents and copyrights) upon receipt of income related to such rights and interests.
- Any occurrence of any reimbursed or sponsored travel (i.e., that which is paid on behalf of the PI/PD or JSU sponsored program employee and not reimbursed to the PI/PD or JSU grant employee), related to their Institution's responsibilities, provided however, that this disclosure requirement does not apply to travel that is reimbursed or sponsored by a Federal, state, or local government agency, an Institution of higher education, an academic teaching hospital, a medical center, or a research institute that is affiliated with an Institution of higher education. PIs/PDs or JSU grant employee's must disclose the purpose of the trip, the identity of the sponsor/organizer, the destination, and the duration of the trip.

Significant Financial Interest does not include:

- Salary, royalties, or other remuneration from JSU;
- Income from seminars, lectures or teaching engagements sponsored by a Federal, state, or local government agency, an Institution of higher education, an academic teaching hospital, a medical center, or a research institute that is affiliated with an Institution of higher education;

- Income from investment vehicles such as mutual funds or retirement accounts, as long as the PI/PD or JSU grant employee does not directly control the investment decisions made in those vehicles;
- Income from service on advisory committees or review panels for government agencies, institutions of higher education, academic teaching hospitals, medical centers, or research institutes affiliated with institutions of higher education.
- Note: Disclosure of foreign financial interests differs from disclosures of domestic financial interests as it relates to the exclusions described above. Investigators must disclose all foreign financial interests (which includes income from seminars, lectures, or teaching engagements, income from service on advisory committees or review panels, reimbursed or sponsored travel received from any foreign entity, including foreign institutions of higher education or foreign governments which includes local, provincial, or equivalent governments of another country when such income meets the threshold for disclosure (e.g., income in excess of \$5,000)).

## **PROCEDURE**

Jacksonville State University chooses to proactively reduce or eliminate conflicts of interest by requiring public disclosure of significant financial interests, monitoring of research by independent reviewers, modification of the research plan, and disqualification from participation in the portion of the sponsoring agency's funded research that would be affected by significant financial interests as follows:

Principal Investigators (or Project Directors) or JSU sponsored program employee must take the following steps when submitting research proposals:

- Complete and submit the Conflict of Interest Disclosure form ([Form 101](#)) that lists any known Significant Financial Interests when submitting any application for a research grant proposal. Each Investigator will disclose their foreign and domestic Significant Financial Interests (and those of the Investigator's spouse and dependent children) that reasonably appear to be related to the Investigator's institutional responsibilities.
- Investigators will report any and all Financial Conflict of Interest (FCOI) in a manner that adheres to their specific sponsoring agency.
- JSU Investigators must complete FCOI training prior to engaging in research or scholarly/creative activity related to any Federally funded grant award, sub-award or contract.

## **MAINTENANCE OF RECORDS**

The JSU Office of Sponsored Programs shall retain all FCOI–related records according to federal grant record retention policy (2 CFR § 200.334) or longer if required by the State of Alabama Records Disposition Authority Policy (<https://archives.alabama.gov/RDA/?id=222>) or JSU Records Retention Policy [I.05.01](#) starting from the date the final expenditure report is submitted, or, where applicable, from other dates. In accordance with 42 CFR 50.605(a)(5), JSU will make information concerning identified FCOIs available in accordance with policy [V.02.04](#).

## **COLLABORATIVE PROJECTS/SUBRECIPIENT REQUIREMENTS**

Collaborators/subrecipients from other organizations must provide a certification that their organizations follow federal policies regarding Investigator FCOI disclosure and that their portion of the project follows their institutional policies.

## **REFERENCES:**

NIH: [NIH Financial Conflict of Interest Regulation](#)

NSF: [42 CFR 50, subpart F](#)

[2 CFR 200](#)

## **RESPONSIBILITY**

Senior Vice President for Finance and Administration and CFO is responsible for this policy.

## **EVALUATION**

This policy will be reviewed every five (5) years by the University Controller.