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All Researchers have an ongoing duty to complete and submit COI disclosure form whenever a new reportable SFI or other potential conflict of interest develops related to current or future externally funded Research.

All Researchers will attest to ORSP that provisions have been made for maintenance of records, identifiable to each award, of all disclosures of significant financial interests or potential conflicts of interest.

To the extent permitted by law, all disclosure forms, management plans, and related information will be confidential. However, the University may be required to make such information available to a government agency, the sponsor, or to a

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Any Researcher who seeks to submit a proposal for an externally funded Research award will completely and accurately disclose any and all potential conflict of interest to the ORSP no less than every twelve months, and within thirty days of receiving a new funding award.

Prior to initiating a subcontract or subaward under ORSP will request a certification from the sub-recipient as to one of the following:

That the sub-recipient has a COI policy in compliance with the applicable federal regulations.

That the sub-recipient will either provide or provide access to their COI policy for ORSP review.

That if the sub-recipient does not have a compliant a COI policy that is complaint with federal regulation the sub-recipient agrees in writing to comply with this policy.

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