

# **WABASH COLLEGE POLICY ON FINANCIAL CONFLICTS OF INTEREST IN PUBLIC HEALTH SERVICE-FUNDED RESEARCH**

## **I. Policy and General Principles**

This Policy implements federal disclosure requirements pertaining to objectivity in research promulgated by the U.S. Public Health Service (PHS) in 42 CFR Part 50 and 45 CFR Part 94. These federal regulations require Wabash College to maintain an appropriate written policy on financial conflict of interest disclosure as a condition for receiving PHS grants. These federal requirements, as implemented in this Policy, are applicable to all proposals for PHS funding.

All Wabash College Investigators must also carry out Research consistent with the standards in the Faculty Handbook and all other applicable Wabash College policies.

## **II. Purpose and Scope of Policy**

### **A. Purpose**

The goal of this Policy is to assure the objectivity with which Research projects are designed, conducted or reported by managing financial conflicts of interest that occur between an Investigator's personal financial interests and his professional Research interests.

This Policy establishes a process of disclosure and independent review when an Investigator (as defined below) has Significant Financial Interest(s). When Wabash College determines that such an interest might reasonably appear to affect the Research directly and significantly, Wabash College will take steps to manage or to eliminate the conflict.

### **B. Scope**

This Policy applies to Research projects for which Wabash College submits a proposal to, or receives research funding from, PHS. This Policy sets forth requirements that each Investigator who is planning to participate in, or is participating in such Research, must follow; provided, however, that this Policy does not apply to SBIR (Small Business Innovation Research) Program Phase I applications.

## **III. Disclosure of Financial Interests**

When an Investigator has a Significant Financial Interest, a written Significant Financial Interest Disclosure Form (Disclosure Form; located in Appendix A) detailing that interest is required. When an Investigator does not have a Significant Financial Interest, the Investigator must still complete the Disclosure Form but can check the box stating that no Significant Financial Interest exists.



remuneration includes 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

**G.**

- 1.** Public disclosure of the FCOI;
- 2.** For Research projects involving human subjects, disclosure of the FCOI directly to participants;
- 3.** Appointment of a



- 6.** Value of the financial interest (dollar ranges are permissible: \$0–\$4,999; \$5,000–\$9,999; \$10,000–\$19,999; amounts between \$20,000–\$100,000 by increments of \$20,000; amounts above \$100,000 by increments of \$50,000), or a statement that the interest is one whose value cannot readily be determined through reference to public prices or other reasonable measures of fair market value;
- 7.** A description of how the financial interest relates to the PHS-funded





**Appendix A**

**Significant Financial Interest Disclosure Form**

This Disclosure Form is to be completed by each Investigator pursuant to the Wabash College Policy on Financial Conflicts of Interest in Public Health Service-Funded Research. Please refer to that Policy for detailed requirements and definitions. Complete this form and submit it to

**VI. For each Significant Financial Interest (use additional pages if necessary):**

**A.** Provide the name of each entity in which the Investigator has a Significant Financial Interest:

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**B.** Provide the nature of the financial interest (for example, equity, consulting fee, travel reimbursement, or honorarium):

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**C.** Indicate the value (dollar amount) of the Significant Financial Interest:

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**D.** For Reimbursed or Sponsored Travel required to be reported by the Policy, indicate all of the following:

**1.** The purpose of the trip:

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**2.** The identity of the sponsor/organizer:

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**3.** The destination:

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**4.** The duration:

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**E.** Describe how the Significant Financial Interest relates to the PHS-funded Research:

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F. Do you believe that the Research project(s) could directly and significantly affect the Significant Financial Interest(s) you are reporting?

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**VII. For further information about the Policy and how to complete this information, you may contact**