

DISCLOSURE AND MANAGEMENT OF OUTSIDE INTERESTS AT THE UNIVERSITY OF ARIZONA

CONFLICT OF INTEREST PROGRAM
520-626-6406 | COI@EMAIL.ARIZONA.EDU

Conflict of Interest Training Certification for Subrecipients and Consultants

Instructions: Please review The University of Arizona’s (the “University”) conflict of interest training material provided to you with this certification. After reviewing the training material provided, please complete the certification below and return a PDF of this fully executed page to COI@email.arizona.edu.

Please also complete the University’s conflict of interest disclosure form. A link to the University’s disclosure form can be found on the last page of this training material. The Conflict of Interest Program will contact you if any further information is required.

Training Requirements: Subrecipients, consultants, and collaborators who are working on federally funded research projects through the University are required to complete conflict of interest training as follows:

1. Prior to the submission of the proposal and prior to participating in any research activities under the federally funded research agreement;
2. At least every four years thereafter for the life of the project;
3. Any time after the University revises the Individual Conflict of Interest in Research Policy* (the “Policy”) or the corresponding procedures in any manner that affects the requirements of the investigators (as that term is defined in the Policy); and
4. Any time after the University finds that an investigator is not in compliance with the Policy or a management plan.

*A link to the Policy is provided on the last page of the training material for your reference.

Certification:

In accordance with the University’s Individual Conflict of Interest in Research Policy, I certify that I have reviewed the provided training material in its entirety.

Signature: _____

Name (please print): _____

Title: _____

Date: _____

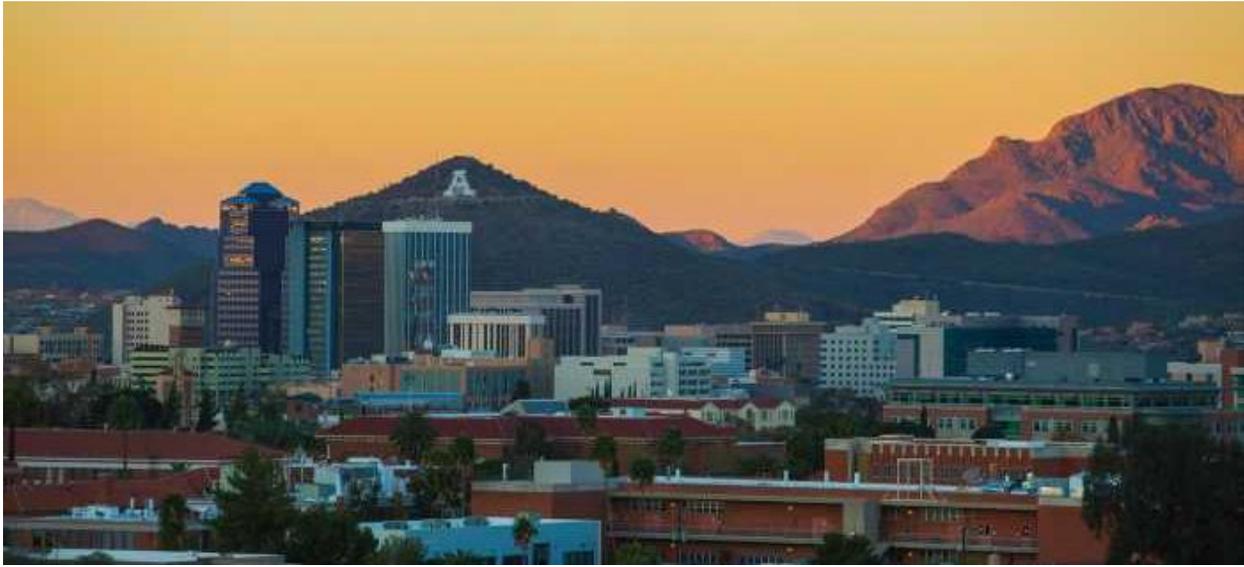
Phone Number/Email Address: _____

Name of Employer: _____

Subaward KFS or PO number or Consulting Agreement Reference Number: _____



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Training Material

I. Introduction and Purpose

Consistent with The University of Arizona’s (the “University”) research, education, technology transfer, and public service missions, the University encourages its faculty, staff, and students to engage in appropriate relationships with private industry and the nonprofit sector. These relationships frequently advance important public interests by fostering public-private interactions in research and development, facilitating the transfer of University-developed knowledge into practical applications, creating new businesses, and promoting general economic development for the benefit of the state of Arizona, the nation and the global community.

At times, however, an individual’s outside financial or other personal interests can, or can appear to, directly and significantly influence decisions made by that individual in the performance of his or her institutional responsibilities, including directly and significantly affecting the design, conduct, or reporting of research. The Conflict of Interest Program works with University employees who are engaged in external relationships to ensure that (1) all significant financial interests and significant personal interests are appropriately disclosed and (2) all identified financial conflicts of interest are managed in accordance with requirements set forth by federal and industry sponsors and the University’s Individual Conflict of Interest in Research Policy* (the



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“Policy”). Management of financial conflicts of interest promotes objectivity in research, ensures the safety and welfare of human research participants, and protects the reputations of researchers, faculty, and the University.

*A link to the Policy is provided on the last page of this training material for your reference.

II. Subrecipients and Consultants

Subrecipients and consultants who conduct research with or for the University pursuant to a federally funded award to the University must also show compliance with certain federal conflict of interest regulations and the Policy. A subrecipient or consultant working under a federally funded agreement from the University may provide a certification to the University indicating it has implemented a Public Health Service Agency (“PHS”) or National Science Foundation (“NSF”) compliant conflict of interest policy and process and that it will apply that policy to all investigators (as that term is defined in Section IV(a) below) who are working under the federally funded award.

Any subrecipient or consultant that does not have its own PHS or NSF-compliant policy and process



within its organization that will be applied to his or her work on the federally funded award must agree that all of its investigators participating in the subcontracted work or consulting project will be subject to the University’s Policy and processes. Subrecipients and consultants who will comply with the University’s Policy should review this conflict of interest training material to fulfill the conflict of interest training requirement.

This training material will provide information to enable investigators to properly disclose outside interests as required by certain federal and industry sponsors and the Policy. Additional resources can be found by using the links provided on the last page of this training material. The following sections of this training material describe the conflict of interest training and disclosure requirements and the process for review of disclosed outside interests at the University.

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III. What are the conflict of interest training requirements?

All investigators (as defined in Section IV(a) below) must complete conflict of interest training as follows:

1. Prior to the submission of the proposal and prior to participating in any research activities under the federally funded research agreement;
2. At least every four years thereafter for the life of the project;
3. Any time after the University revises the Policy or the corresponding procedures in any manner that affects the requirements of the investigators; and
4. Any time after the University finds that an investigator is not in compliance with the Policy or a management plan.



You will have completed the conflict of interest training requirement after reviewing this training module in full and signing and returning the first page of this document to the University's subawards team!

IV. What are the conflict of interest disclosure requirements?

a. Who is required to complete a disclosure?

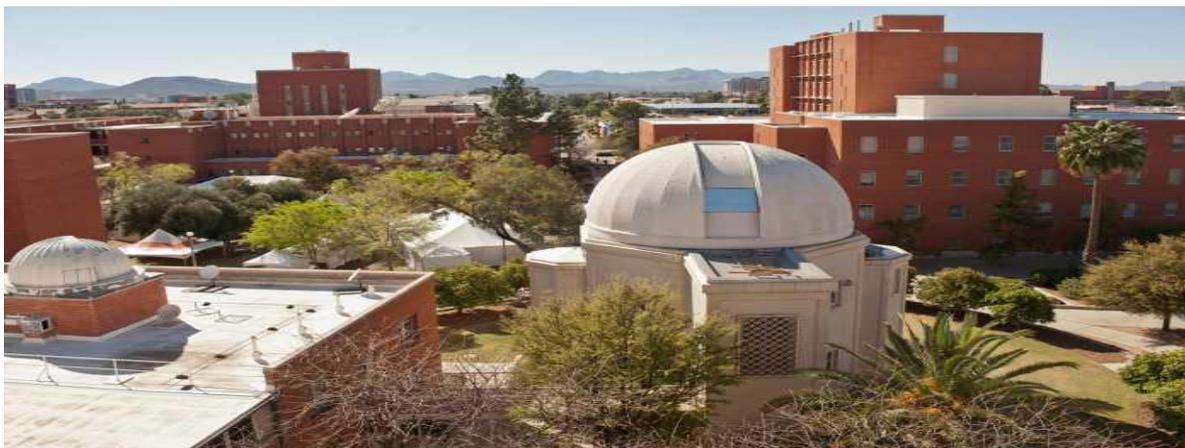
All investigators are required to complete a disclosure. An investigator is defined as any person who is responsible for the design, conduct, or reporting of research, regardless of title or position. This includes, but is not limited to, the principal investigator ("PI"), co-PI, co-investigator, project director ("PD"), Co-PD, and senior or other key personnel. Students, trainees, postdoctoral researchers, collaborators, volunteers, consultants, or other staff members might also be investigators if those individuals have some degree of independence in performing some aspect of the design, conduct, or reporting of research.



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b. What do I need to disclose?

An investigator is required to disclose all significant financial interests (as defined in Section IV(b)(ii) below) or significant personal interests (as defined in Section IV(b)(i) below) that he or she holds or that his or her spouse, dependent children, or domestic partner holds if those outside interests would (i) reasonably appear to be related to his or her institutional responsibilities or (ii) would reasonably appear to be affected by the research. Institutional responsibilities include an investigator's professional responsibilities on behalf of the institution receiving the funds, including, but not limited to, research, research consultation, teaching, professional practice, institutional committee memberships, and service on panels such as Institutional Review Boards or Data and Safety Monitoring Boards.



i. Significant Personal Interests: A significant personal interest is defined as any managerial, professional, or fiduciary position held in any third-party organization (e.g., as an officer, director, trustee, advisory board member, board of directors, or other managerial position), whether or not the investigator (or the investigator's spouse, dependent children, or domestic partner, as applicable) is compensated for that position.

ii. Significant Financial Interests: A significant financial interest is a financial interest consisting of one or more of the following interests of the investigator (and those of the investigator's spouse, dependent children, or domestic partner) that reasonably appears to be related to the investigator's institutional responsibilities:



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1. Intellectual Property: Intellectual property rights and interests (e.g., patents, copyrights), upon receipt of income related to such rights and interests.

2. Public Entities: Remuneration received from a publicly-traded entity during the twelve months prior to disclosure that (in combination with the value of any equity interest in the entity) exceeds \$5,000. 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 prices or other reasonable measures of fair market value.

3. Non-Public Entities: Remuneration received from a non-publicly traded entity during the twelve months prior to disclosure that exceeds \$5,000 when aggregated or any equity interest held in a non-publicly traded entity.

4. PHS-funded investigators: Investigators who are working on a PHS-funded research project also must disclose the occurrence of any reimbursed or sponsored travel related to their institutional responsibilities. Investigators do not have to report 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.

Please see the Policy for more detailed information, including what is not required to be disclosed. Some common examples of outside interests that do not need to be disclosed include income from investment vehicles such as mutual funds and retirement accounts, as long as the investigator does not directly control the investment decisions made by the investment managers within these funds or accounts.

c. What if I have nothing to report?

You still need to complete the required training and disclosure requirements even if you have no outside interests that meet the definition of a significant financial interest or a significant personal interest as described above. In this case, you will simply certify that you have no interests to report on the form and submit the form.



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d. How do I complete the disclosure form?

A link to the University's disclosure form for subrecipients and consultants can be found on the last page of this training material. Please answer each of the questions and submit the form. The Conflict of Interest Program will contact you if any further information is required.

e. How often do I need to update my disclosure?

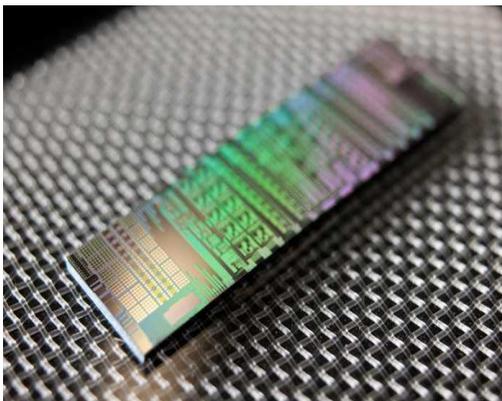
i. Initially: The disclosure form should be submitted prior to the submission of the proposal and prior to participating in any research activities under the federally funded research agreement.

ii. Within 30 days of Acquiring a New Interest: New significant financial interests and significant personal interests should be disclosed to the Conflict of Interest Program within 30 days of acquiring a new interest by completing a new disclosure form.

iii. Annually: Disclosure forms are required to be re-certified annually even if the investigator has nothing new to report.

V. What happens after I submit my disclosure?

The Conflict of Interest Program will conduct an initial review of the disclosure. If the investigator has nothing to disclose, then no further action is required on the part of the investigator at that



time. The investigator will be required to recertify his or her disclosure annually and within 30 days of acquiring a new significant financial interest or significant personal interest. The Conflict of Interest Program will notify the University subawards team that the investigator has completed his or her conflict of interest disclosure requirements.

If the investigator discloses a significant financial interest or significant personal interest, then the Conflict of



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Interest Program and, if applicable, the University's Institutional Review Committee ("IRC") will review the disclosure to determine if the disclosed outside interests could directly and significantly affect the design, conduct, or reporting of research or could compromise, or appear to compromise, the investigator's objectivity in the performance of his or her institutional responsibilities ("financial conflict of interest"). The IRC is a University-wide committee consisting of at least ten faculty members. If the IRC finds a financial conflict of interest exists, the Conflict of Interest Program will work with the investigator to manage, reduce, or eliminate the financial conflict of interest.

The Conflict of Interest Program will notify the University subawards team that the investigator has completed his or her conflict of interest disclosure requirements once (1) the financial conflict of interest has been eliminated, (2) a management plan has been fully approved by the University's Senior Vice President for Research, or (3) any administrative directives have been issued. The investigator must comply with all terms and conditions of a management plan or any administrative directives issued by the IRC.



VI. What else do I need to know?

a. Human Subjects

When research involves human subjects, the Institutional Review Board ("IRB") exercises final authority to approve a management plan that has been developed to manage a financial conflict of interest. The IRB may include additional management provisions in the management plan or may require investigators to obtain additional IRB approvals pursuant to human subjects research regulations or as required by other applicable review committees.

b. Noncompliance

Investigators are required to comply with the Policy and with any management plans or administrative directives that may be issued by the IRC. In the event that the University becomes

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aware through its active monitoring processes or otherwise that an investigator may have been noncompliant with one or more requirements of the Policy, the University will make appropriate inquiries to determine the facts. In cases of noncompliance with this Policy, the University will apply appropriate sanctions, enforcement mechanisms or administrative actions in accordance with its administrative, academic, contractual and employment policies or federal regulations or policies.

c. External Reporting

The University is required to provide reports to certain research sponsors, including but not limited to all PHS agencies, regarding the implementation of a management plan to manage any financial conflicts of interest. According to the regulations and policies of certain research sponsors, including but not limited to all PHS agencies, the University is also required to respond to written requests concerning a finding of a financial conflict of interest within five business days of receiving such a request.

[Please see the following page for contact information and links to more information.]



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Contact Information:

Please contact the University's Conflict of Interest Program if you have any questions or need any additional information.

<u>COI General Contact Information:</u>	coi@email.arizona.edu (520) 626-6406
<u>Conflict of Interest Officer:</u>	Taren Ellis Langford E-mail: tmellis@email.arizona.edu
<u>Conflict of Interest Senior Analyst</u>	Matt Milner E-mail: mmilner@email.arizona.edu
<u>Conflict of Interest Analyst:</u>	Tish Liggett E-mail: lliggett@email.arizona.edu
<u>Conflict of Interest Associate:</u>	Dennis Tamblyn E-mail: dtamblyn@email.arizona.edu

Links: Please review the links below for more information.

1. University's Individual Conflict of Interest in Research Policy: <http://policy.arizona.edu/research/individual-conflict-interest-research>
2. University's Disclosure Form: <http://rgw.arizona.edu/disclosure-form-subcontractors-consultants-and-collaborators>
3. University's Conflict of Interest Website: <http://rgw.arizona.edu/compliance/conflict-interest-program>
4. Public Health Service Agency and National Institutes of Health regulations (42 C.F.R. Part 50, Subpart F): <http://grants.nih.gov/grants/policy/coi/>
5. National Science Foundation Award and Administration Guide: http://www.nsf.gov/pubs/policydocs/pappguide/nsf15001/aag_4.jsp#A

