

Gettysburg College

Conflict of Interest Policy for Faculty & Staff Applying for Federal Grants and Contracts

1. SCOPE.

As set by relevant federal regulations, including the [National Science Foundation \(NSF\)](#), [National Institute of Health \(NIH\)](#) and [Federal Register](#), the following statement of policy applies to each member of the faculty or staff (Investigator) applying for a Gettysburg College administered grant from a federal agency or foundation. By assuming this responsibility for themselves, colleges and universities may avoid outside monitoring and regulation by the Federal government.

2. FIDUCIARY RESPONSIBILITIES.

Employees, officers, and members of the board of the College serve the public trust and have a clear obligation to fulfill their responsibilities in a manner consistent with this fact. All decisions of the board and officers of the administration and the faculty and academic staff are to be made solely on the basis of a desire to promote the best interests of the College and the public good. The College's integrity must be protected and advanced at all times.

College faculty or staff applying for grants may be involved in the affairs of other organizations. It is unlikely an effective faculty will consist of individuals entirely free from at least perceived conflicts of interest. Although most such potential conflicts are and will be deemed to be inconsequential, everyone is responsible for ensuring the College is made aware of situations involving business relationships that could represent a conflict of interest with respect to an outside grant.

Thus the College requires that applicants for a grant of College-administered funds from a federal agency:

(1) Review this policy; (2) Disclose any possible business relationships that reasonably could give rise to a conflict of interest for the investigator and/or his or her spouse/dependent children; and (3) Acknowledge by her/his signature that s/he is in accordance with the letter and spirit of this policy. In addition to making this statement at the time of application, investigators must renew this statement a) within 30 days of identification of a new conflicting interest, and b) annually for previously identified conflicts of interest.

3. DISCLOSURE.

Faculty and academic staff are required to list on the Compliance & Disclosure Form only those substantive business relationships (in federal parlance, "significant financial interest") that could directly affect the design, conduct, or reporting of federally funded research.

"Significant financial interest" or SFI includes any payments or equity interests in the 12 months preceding the disclosure that, when aggregated, exceed \$5,000 in remuneration and/or in equity interest in any publicly traded entity **AND/OR** \$5,000 in remuneration or *any* equity interest in a non-publicly traded entity that might affect the investigator or the research. In the event that a faculty member is uncertain as to the appropriateness of listing a particular relationship, the Dean of the College, as Institutional Grants Administrator, should be consulted. This policy per federal guidelines applies to the investigators responsible for the design, conduct, or reporting of federally-funded research; **and their spouses and dependent children**. This policy also applies to sub-grantee investigators.

Conflicts of interest frequently are matters of degree and judgment, and the College expects faculty and academic staff to be alert to the possible effect of outside activities on the integrity of their decisions and on their ability to fulfill their obligations to the institution and/or to funding agencies. As potential or actual conflicts of interest arise, the Institutional Grants Administrator will determine which conditions or restrictions might be imposed to manage, reduce, or eliminate actual or potential conflicts of interest. Records of financial disclosures will be maintained for at least three years from the date of submission of final expenditures reports. The College will make conflict information available, upon request, to federal agencies.