

**ADMINISTRATIVE PROCEDURE**  
**Conflict of Interest for Sponsored Projects (PHS/Non-PHS)**

*Related Policy: 13.005 -- Conflict of Interest for Sponsored Projects*

**Procedure 1:**

**For funded projects and applications for funding from the U.S. Public Health Service (PHS), including the National Institutes of Health (NIH).**

**Definitions—For the purposes of this procedure, the following definitions will apply:**

1. **FCOI Report.** *FCOI report* means an Institution's report of a financial conflict of interest to a PHS Awarding Component.
2. **HHS.** *HHS* means the United States Department of Health and Human Services, and any components of the Department to which the authority involved may be delegated.
3. **Institution.** *Institution* means any domestic or foreign, public or private, entity or organization (excluding a Federal agency) that is applying for, or that receives, PHS research funding.
4. **Institutional Responsibilities.** *Institutional responsibilities* means an Investigator's professional responsibilities **on behalf of** the Institution. Examples of such responsibilities include activities such as research, research consultation, teaching, professional practice, institutional committee memberships, and service on panels such as Institutional Review Boards or Data and Safety Monitoring Boards.
5. **Manage.** *Manage* means taking action to address a financial conflict of interest, which can include reducing or eliminating the financial conflict of interest to ensure, to the extent possible, that the design, conduct, and reporting of research will be free from bias.
6. **PHS.** *PHS* means the Public Health Service of the U.S. Department of Health and Human Services, and any components of the PHS to which the authority involved may be delegated, including the National Institutes of Health (NIH).
7. **PHS Awarding Component.** *PHS Awarding Component* means the organizational unit of the PHS that funds the research.
8. **Senior/Key Personnel.** *Senior/key personnel* means the Principal Investigator and any other person identified as senior/key personnel by UNT in the grant application, progress report, or any other report submitted to the PHS by UNT.
9. **Significant Financial Interest.** *Significant Financial Interest (SFI)* means:
  - (1) A financial interest consisting of one or more of the following interests of the Investigator (and those of the Investigator's spouse and dependent children) that reasonably appears to be related to the Investigator's institutional responsibilities:
    - (i) With regard to any publicly traded entity, a *Significant Financial Interest* exists if the value of any remuneration received from the

entity in the twelve 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. For purposes of this definition, 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;

(ii) With regard to any non-publicly traded entity, a *Significant Financial Interest* exists if the value of any remuneration received from the entity in the twelve months preceding the disclosure, when aggregated, exceeds \$5,000, or when the Investigator (or the Investigator's spouse or dependent children) holds any equity interest (e.g., stock, stock option, or other ownership interest); or

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

(2) Certain kinds of sponsored or reimbursed travel may also constitute an SFI. However, it may be impossible for an Investigator to make that determination, so Investigators covered by these procedures must disclose to UNT the occurrence of any travel that is reimbursed or sponsored by any entity **other than** a Federal, state, or local government agency, an Institution of higher education as defined at 20 U.S.C. 1001(a), an academic teaching hospital, a medical center, or a research institute that is affiliated with an Institution of higher education. Travel that is funded or reimbursed through UNT (even if through an external grant) does NOT need to be disclosed under this procedure.

The term *Significant Financial Interest* does **not** include the following types of financial interests:

- salary, royalties, or other remuneration paid by UNT to the Investigator if the Investigator is currently employed or otherwise appointed by UNT, including intellectual property rights assigned to UNT and agreements to share in royalties related to such rights;
- income from investment vehicles, such as mutual funds and retirement accounts, as long as the Investigator does not directly control the investment decisions made in these vehicles;

- income from seminars, lectures, or teaching engagements sponsored by a Federal, state, or local government agency, an Institution of higher education as defined at 20 U.S.C. 1001(a), an academic teaching hospital, a medical center, or a research institute that is affiliated with an Institution of higher education; or
- income from service on advisory committees or review panels for a Federal, state, or local government agency, an Institution of higher education as defined at 20 U.S.C. 1001(a), an academic teaching hospital, a medical center, or a research institute that is affiliated with an Institution of higher education.

10. **UNT.** “UNT” means the University of North Texas.

### **Investigator Responsibilities Regarding Financial Conflicts of Interest.**

**1. Training.** Before engaging in research related to any PHS-funded grant and at least every four years, each Investigator will complete training about Investigator responsibilities under PHS and UNT requirements relating to disclosure of Financial Conflicts of Interest. This training must also be completed immediately when any of the following circumstances apply:

- when UNT revises its financial conflict of interest policies or procedures in any manner that affects the requirements of Investigators;
- when an Investigator is new to UNT; or
- when UNT finds that an Investigator is not in compliance with UNT’s financial conflict of interest policy or procedures or management plan.

**2. Disclosure of Significant Financial Interests.** When an Investigator submits a proposal for external funding to a PHS agency (for procedures related to funding entities other than the PHS, the Investigator will complete and provide to the Research Integrity Officer a “Significant Financial Interest Disclosure” form (the “disclosure”) either electronically or in paper form. In the disclosure the Investigator will indicate the general category of any Significant Financial Interests held by the Investigator, the Investigator’s spouse, and the Investigator’s children that reasonably appears to be related to the Investigator’s institutional responsibilities.

For any categories of Significant Financial Interests indicated on the disclosure, the Investigator will include supplemental documentation that identifies the entity involved, the nature and the amount of the interest, and how the SFI relates to the PHS funding applied for.

- 3. Updating Disclosures.** The Investigator must update the Disclosure on an annual basis while a proposal is pending or during the period of an award, and also within 30 days after the acquisition of any new SFI.

### **UNT Responsibilities Regarding Investigator Financial Conflicts of Interest**

- 1. Policy and Procedures.** UNT will maintain an up-to-date, written, enforced policy and related procedures on Financial Conflicts of Interest that complies with PHS regulations and make such policy and procedures available via a publicly accessible Web site.
- 2. Informing Investigators.** UNT will inform each Investigator of the UNT's policy and procedures on Financial Conflicts of Interest, the Investigator's responsibilities regarding disclosure of Significant Financial Interests, and of the applicable regulations, and require each Investigator to complete training regarding the same prior to engaging in research related to any PHS-funded grant and at least every four years, and immediately when any of the following circumstances apply:
  - UNT revises its financial conflict of interest policies or procedures in any manner that affects the requirements of Investigators;
  - An Investigator is new to UNT; or
  - UNT finds that an Investigator is not in compliance with UNT's financial conflict of interest policy or procedures or management plan.
- 3. Procedures for Subrecipients.** If UNT carries out the PHS-funded research through a subrecipient (e.g., a subcontractor, contractor or collaborator), UNT must take reasonable steps to ensure that any subrecipient Investigator complies with this subpart by:
  - (a) Incorporating as part of a written agreement with the subrecipient terms that establish whether the UNT financial conflicts of interest policy and procedures or that of the subrecipient will apply to the subrecipient's Investigators.
    - If the subrecipient's Investigators must comply with the subrecipient's financial conflicts of interest policy, the subrecipient will certify as part of the agreement referenced above that its policy complies with the PHS requirements. If the subrecipient cannot provide such certification, the agreement will state that subrecipient Investigators are subject to the UNT financial conflicts of interest policy and procedures for disclosing significant financial interests that are directly related to the subrecipient's work for UNT;

- Additionally, if the subrecipient's Investigators must comply with the subrecipient's financial conflicts of interest policy, the agreement referenced above will specify time period(s) for the subrecipient to report all identified financial conflicts of interest to UNT. Such time period(s) will be sufficient to enable UNT to provide timely FCOI reports, as necessary, to the PHS.
- Alternatively, if the subrecipient's Investigators must comply with the UNT financial conflicts of interest policy and procedures, the agreement referenced above will specify time period(s) for the subrecipient to submit all Investigator disclosures of Significant Financial Interests to UNT. Such time period(s) will be sufficient to enable UNT to comply timely with its review, management, and reporting obligations under this sub-section of the procedures.

(b) Providing FCOI reports to the PHS Awarding Component regarding all financial conflicts of interest of all subrecipient Investigators consistent with applicable regulations, *i.e.*, prior to the expenditure of funds and within 60 days of any subsequently identified FCOI.

- 4. Disclosure Process for Investigators.** The Vice President for Research and Economic Development will designate a Research Integrity Officer to solicit and review disclosures of Significant Financial Interests from each Investigator who is planning to participate in, or is participating in, the PHS-funded research.

The Research Integrity Officer will require that each Investigator who is planning to participate in the PHS-funded research disclose to the Research Integrity Officer the Investigator's Significant Financial Interests (and those of the Investigator's spouse and dependent children) no later than the time of application for PHS-funded research. The Research Integrity Officer will require each Investigator who is participating in the PHS-funded research to submit an updated disclosure of Significant Financial Interests at least annually during the period of the award. Such disclosure will include any information that was not disclosed initially to UNT or in a subsequent disclosure of Significant Financial Interests (e.g., any financial conflict of interest identified on a PHS-funded project that was transferred from another Institution), and will include updated information regarding any previously disclosed Significant Financial Interest (e.g., the updated value of a previously disclosed equity interest).

The Research Integrity Officer will require each Investigator who is participating in the PHS-funded research to submit an updated disclosure of Significant Financial Interests within 30 days of discovering or acquiring (e.g., through purchase, marriage, or inheritance) a new Significant Financial Interest.

An Investigator's Significant Financial Interest is related to PHS-funded research when UNT, through its Research Integrity Officer, reasonably determines that the Significant Financial Interest:

- could be affected by the PHS-funded research; or
- is in an entity whose financial interest could be affected by the research.

UNT may involve the Investigator in the Research Integrity Officer's determination of whether a Significant Financial Interest is related to the PHS-funded research. A Financial Conflict of Interest exists when UNT, through its Research Integrity Officer or its Conflict of Interest Review Committee (see Policy Number 16.12.3), reasonably determines that the Significant Financial Interest could directly and significantly affect the design, conduct, or reporting of the PHS-funded research.

- 5. Management of Financial Conflicts of Interest.** The Research Integrity Officer will take such actions as necessary to manage Financial Conflicts of Interest, including any financial conflicts of a subrecipient Investigator. Management of an identified Financial Conflict of Interest requires development and implementation of a management plan and, if necessary, a retrospective review and a mitigation report as required by applicable regulations.
- 6. Reporting to PHS.** The Research Integrity Officer will provide initial and ongoing FCOI reports to the PHS as required by applicable regulations.
- 7. Record Retention.** The Research Integrity Officer will maintain records relating to all Investigator disclosures of financial interests and UNT's review of, and response to, such disclosures (whether or not a disclosure resulted in UNT's determination of a Financial Conflict of Interest) and all actions under UNT's policy and procedures or retrospective review, if applicable, for at least three years from the date the final expenditures report is submitted to the PHS or, where applicable, from other dates specified elsewhere in this procedure for different situations.
- 8. Enforcement.** The Research Integrity Officer will establish adequate enforcement mechanisms and provide for employee sanctions or other administrative actions to ensure Investigator compliance as appropriate (see Policy Number 16.12.3.3).
- 9. Certification in Funding Applications.** UNT will certify, in each application for PHS funding to which this procedure applies, that UNT:
  - Has in effect an up-to-date, written, and enforced administrative process to identify and manage financial conflicts of interest with respect to all research projects for which funding is sought or received from the PHS;
  - Will promote and enforce Investigator compliance with this procedure's requirements, including those pertaining to disclosure of Significant Financial Interests;

- Will manage financial conflicts of interest and provide initial and ongoing FCOI reports to the PHS Awarding Component consistent with PHS requirements;
- Agrees to make information available, promptly upon request, to the HHS relating to any Investigator disclosure of financial interests and UNT's review of, and response to, such disclosure, whether or not the disclosure resulted in the Institution's determination of a financial conflict of interest; and
- Will fully comply with the requirements of this procedure.

**10. Management of Financial Conflicts of Interest.** Prior to UNT's expenditure of any funds under a PHS-funded research project, the Research Integrity Officer will review all Investigator disclosures of Significant Financial Interests; determine whether any Significant Financial Interests relate to PHS-funded research; determine whether a Financial Conflict of Interest exists; and, if so, develop and implement a management plan that will specify the actions that have been, and will be, taken to manage such Financial Conflict of Interest. The Research Integrity Officer at his or her discretion may refer an Investigator disclosure to the Conflict of Interest Review Committee (see Policy Number 16.12.3.3) to determine whether a Financial Conflict of Interest exists. Examples of conditions or restrictions that might be imposed to manage a Financial Conflict of Interest include, but are not limited to:

- Public disclosure of Financial Conflicts of Interest (e.g., when presenting or publishing the research);
- For research projects involving human subjects research, disclosure of Financial Conflicts of Interest directly to participants;
- Appointment of an independent monitor capable of taking measures to protect the design, conduct, and reporting of the research against bias resulting from the Financial Conflict of Interest;
- Modification of the research plan;
- Change of personnel or personnel responsibilities, or disqualification of personnel from participation in all or a portion of the research;
- Reduction or elimination of the financial interest (e.g., sale of an equity interest); or
- Severance of relationships that create financial conflicts.

**11. New Investigator or New SFI.** Whenever in the course of an ongoing PHS-funded research project, an Investigator who is new to participating in the research project discloses a Significant Financial Interest or an existing Investigator discloses a new Significant Financial Interest to UNT, the Research Integrity Officer will, within 60 days: review the disclosure of the Significant Financial Interest; determine whether it is related to PHS-funded research; determine whether a Financial Conflict of Interest exists or refer the disclosure to Conflict of Interest Review Committee for such a determination; and, if a Financial Conflict of Interest exists, implement, on at least an

interim basis, a management plan that will specify the actions that have been, and will be, taken to manage such Financial Conflict of Interest. Depending on the nature of the Significant Financial Interest, UNT may determine that additional interim measures are necessary with regard to the Investigator's participation in the PHS-funded research project between the date of disclosure and the completion of UNT's review.

**12. SFI Not Disclosed or Reviewed.** Whenever UNT identifies a Significant Financial Interest that was not disclosed timely by an Investigator or, for whatever reason, was not previously reviewed by UNT during an ongoing PHS-funded research project (e.g., was not timely reviewed or reported by a subrecipient), the Research Integrity Officer will, within sixty days: review the Significant Financial Interest; determine whether it is related to PHS-funded research; determine whether a Financial Conflict of Interest exists or refer the disclosure to the Conflict of Interest Review Committee for such a determination; and, if so:

- (i) Implement, on at least an interim basis, a management plan that shall specify the actions that have been, and will be, taken to manage such Financial Conflict of Interest going forward;
- (ii) In addition, whenever a Financial Conflict of Interest is not identified or managed in a timely manner including failure by the Investigator to disclose a Significant Financial Interest that is determined by UNT to constitute a Financial Conflict of Interest; failure by UNT to review or manage such a Financial Conflict of Interest; or failure by the Investigator to comply with a Financial Conflict of Interest Management plan, UNT will, within 120 days of UNT's determination of noncompliance, complete a retrospective review of the Investigator's activities and the PHS-funded research project to determine whether any PHS-funded research, or portion thereof, conducted during the time period of the noncompliance, was biased in the design, conduct, or reporting of such research.

UNT is required to document the retrospective review; such documentation shall include, but not necessarily be limited to, all of the following key elements:

- Project number;
- Project title;
- Principal Investigator;
- Name of the Investigator with the FCOI;
- Name of the entity with which the Investigator has a FCOI;
- Reason(s) for the retrospective review;
- Detailed methodology used for the retrospective review (e.g., methodology of the review process, composition of the review panel, documents reviewed);



- Findings of the review; and
- Conclusions of the review.

(iii) Based on the results of the retrospective review, if appropriate, UNT will update the previously submitted FCOI report, specifying the actions that will be taken to manage the Financial Conflict of Interest going forward. If bias is found, UNT is required to notify the PHS Awarding Component promptly and submit a mitigation report to the PHS Awarding Component. The mitigation report must include, at a minimum, the key elements documented in the retrospective review above and a description of the impact of the bias on the research project and UNT's plan of action or actions taken to eliminate or mitigate the effect of the bias (e.g., impact on the research project; extent of harm done, including any qualitative and quantitative data to support any actual or future harm; analysis of whether the research project is salvageable). Thereafter, UNT will submit FCOI reports annually, as specified elsewhere in this procedure. Depending on the nature of the FCOI, UNT may determine that additional interim measures are necessary with regard to the Investigator's participation in the PHS-funded research project between the date that the FCOI or the Investigator's noncompliance is determined and the completion of UNT's retrospective review.

Whenever UNT implements a management plan pursuant to this subsection, UNT will monitor Investigator compliance with the management plan on an ongoing basis until the completion of the PHS-funded research project.

**13. Public Accessibility.** Prior to UNT's expenditure of any funds under a PHS-funded research project, UNT will ensure public accessibility, via a publicly accessible Web site or written response to any requestor within five business days of a request, of information concerning any SFI disclosed to UNT that meets the following three criteria:

- The SFI was disclosed and is still held by the senior/key personnel as defined by this procedure;
- UNT determines that the Significant Financial Interest is related to the PHS-funded research; and
- UNT determines that the Significant Financial interest is a Financial Conflict of Interest.

The information that UNT makes available via a publicly accessible Web site or written response to any requestor within five business days of a request, will include, at a minimum, the following: the Investigator's name; the Investigator's title and role with respect to the research project; the name of the entity in which the Significant Financial Interest is held; the nature of the Significant Financial Interest; and the approximate

dollar value of the Significant 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 be readily determined through reference to public prices or other reasonable measures of fair market value.

If UNT uses a publicly accessible Web site for the purposes of this requirement, the information that UNT posts will be updated at least annually. In addition, UNT will update the Web site within sixty days of UNT's receipt or identification of information concerning any additional Significant Financial Interest of the senior/key personnel for the PHS-funded research project that was not previously disclosed, or upon the disclosure of a Significant Financial Interest of senior/key personnel new to the PHS-funded research project, if UNT determines that the Significant Financial Interest is related to the PHS-funded research and is a FCOI. The Web site will note that the information provided is current as of the date listed and is subject to updates, on at least an annual basis and within 60 days of UNT's identification of a new FCOI. If UNT responds to written requests for the purposes of this subsection, UNT will note in its written response that the information provided is current as of the date of the correspondence and is subject to updates, on at least an annual basis and within 60 days of UNT's identification of a new FCOI, which should be requested subsequently by the requestor.

Information concerning the Significant Financial Interests of an individual subject to this subsection will remain available, for responses to written requests or for posting via UNT's publicly accessible Web site for at least three years from the date that the information was most recently updated.

**14. Reporting of Financial Conflicts of Interest to PHS.** Prior to UNT's expenditure of any funds under a PHS-funded research project, UNT will provide to the PHS Awarding Component an FCOI report regarding any Investigator's Significant Financial Interest found by UNT to be conflicting and ensure that UNT has implemented a conflict management plan. In cases in which UNT identifies a FCOI and eliminates it prior to the expenditure of PHS-awarded funds, UNT will not submit an FCOI report to the PHS Awarding Component.

For any Significant Financial Interest that UNT identifies as conflicting subsequent to UNT's initial FCOI report during an ongoing PHS-funded research project (e.g., upon the participation of an Investigator who is new to the research project), UNT will provide to the PHS Awarding Component, within 60 days, an FCOI report regarding the FCOI and ensure that UNT has implemented a conflict management plan. Where such FCOI report involves a Significant Financial Interest that was not disclosed timely by an Investigator or, for whatever reason, was not previously reviewed or managed by UNT (e.g., was not timely reviewed or reported by a subrecipient), UNT also is required to complete a retrospective review to determine whether any PHS-funded research, or portion thereof, conducted prior to the identification and management of the FCOI was biased in the design, conduct, or reporting of such research. If bias is found, UNT is

required to notify the PHS Awarding Component promptly and submit a mitigation report to the PHS Awarding Component.

Any FCOI report required in either of the above situations will include sufficient information to enable the PHS Awarding Component to understand the nature and extent of the financial conflict, and to assess the appropriateness of UNT's management plan. Elements of the FCOI report shall include, but are not necessarily limited to the following:

- (i) Project number;
- (ii) Principal Investigator;
- (iii) Name of the Investigator with the FCOI;
- (iv) Name of the entity with which the Investigator has a FCOI;
- (v) Nature of the financial interest (e.g., equity, consulting fee, travel reimbursement, honorarium);
- (vi) 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 be readily determined through reference to public prices or other reasonable measures of fair market value;
- (vii) A description of how the financial interest relates to the PHS-funded research and the basis for UNT's determination that the financial interest conflicts with such research; and
- (viii) A description of the key elements of UNT's management plan, including:
  - (A) Role and principal duties of the conflicted Investigator in the research project;
  - (B) Conditions of the management plan;
  - (C) How the management plan is designed to safeguard objectivity in the research project;
  - (D) Confirmation of the Investigator's agreement to the management plan;

(E) How the management plan will be monitored to ensure Investigator compliance; and

(F) Other information as needed.

For any FCOI previously reported by UNT with regard to an ongoing PHS-funded research project, UNT will provide to the PHS Awarding Component an annual FCOI report that addresses the status of the FCOI and any changes to the management plan for the duration of the PHS-funded research project. The annual FCOI report will specify whether the financial conflict is still being managed or explain why the FCOI no longer exists. UNT will provide annual FCOI reports to the PHS Awarding Component for the duration of the project period (including extensions with or without funds) in the time and manner specified by the PHS Awarding Component.

**15. Remedies.** If the failure of an Investigator to comply with UNT's financial conflicts of interest policy or procedure or a financial conflict of interest management plan appears to have biased the design, conduct, or reporting of the PHS-funded research, UNT will promptly notify the PHS Awarding Component of the corrective action taken or to be taken. The PHS Awarding Component will consider the situation and, as necessary, take appropriate action, or refer the matter to UNT for further action, which may include directions to UNT on how to maintain appropriate objectivity in the PHS-funded research project. PHS may, for example, require Institutions employing such an Investigator to enforce any applicable corrective actions prior to a PHS award or when the transfer of a PHS grant(s) involves such an Investigator.

The PHS Awarding Component and/or HHS may inquire at any time before, during, or after award into any Investigator disclosure of financial interests and UNT's review (including any retrospective review) of, and response to, such disclosure, regardless of whether the disclosure resulted in UNT's determination of a FCOI. UNT is required to submit, or permit on site review of, all records pertinent to compliance with this requirement. To the extent permitted by law, HHS will maintain the confidentiality of all records of financial interests. On the basis of its review of records or other information that may be available, the PHS Awarding Component may decide that a particular FCOI will bias the objectivity of the PHS-funded research to such an extent that further corrective action is needed or that UNT has not managed the FCOI in accordance with applicable regulations. The PHS Awarding Component may determine that imposition of special award conditions under 45 CFR 74.14 and 92.12, or suspension of funding or other enforcement action under 45 CFR 74.62 and 92.43, is necessary until the matter is resolved.

## Procedure 2:

### For funded projects and applications for funding from entities other than the U.S. Public Health Service (PHS)

#### Definitions—For the purposes of this procedure, the following definitions will apply:

1. **Significant Financial Interest (SFI)**. *Significant Financial Interest (SFI)* means anything of monetary value, including but not limited to, salary or other payments for services (e.g., consulting fees or honoraria); equity interests (e.g., stocks, stock options or other ownership interests); and intellectual property rights (e.g., patents, copyrights and royalties from such rights). The term does **not** include:
  - a. salary, royalties, or other remuneration from UNT;
  - b. income from seminars, lectures, or teaching engagements sponsored by public or nonprofit entities;
  - c. income from service on advisory committees or review panels for public or nonprofit entities;
  - d. an equity interest that when aggregated for the investigator and the investigator's spouse and dependent children, meets both of the following tests: (a) does not exceed \$10,000 in value as determined through reference to public prices or other reasonable measures of fair market value, and (b) does not represent more than a five percent ownership interest in any single entity; or
  - e. salary, royalties or other payments that, when aggregated for the investigator and the investigator's spouse and dependent children over the next twelve months, are not expected to exceed \$10,000.
2. **UNT**. "UNT" means the University of North Texas.

#### Procedures

When a UNT Investigator submits a proposal for external funding from an entity other than the U.S. Public Health Service (for procedures related to the U.S. Public Health Service, the Investigator will complete and provide to the Research Integrity Officer a "Significant Financial Interests Disclosure" form (the "disclosure") either electronically or in paper form. In the disclosure the Investigator will indicate the general category of any Significant Financial Interests held by the Investigator, the Investigator's spouse, and the Investigator's children:

1. that would reasonably appear to be affected by the research proposed for funding; or
2. in entities whose financial interests would reasonably appear to be affected by the research proposed for funding.

For any categories of Significant Financial Interests indicated on the disclosure, the Investigator will include supplemental documentation that includes the entity involved, the nature and the amount of the Significant Financial Interest, and an explanation regarding how the Significant Financial Interest is related to the research proposed for funding.

If the Investigator does not disclose any Significant Financial Interests in the disclosure, the Office of Research Services will process the proposal in the ordinary manner.

If the Investigator discloses any Significant Financial Interests in the disclosure, the Research Integrity Officer appointed by the Vice President for Research & Economic Development will review the disclosure, the supporting documentation and the proposal to determine if there is a potential conflict of interest. If there is sufficient evidence to indicate a possible financial conflict of interest (FCOI), the Research Integrity Officer at his or her discretion will forward the disclosure, the supporting documentation, and the proposal to the Conflict of Interest Review Committee for review to determine if an FCOI exists and, if so, what modifications or conditions, if any, should be imposed to manage, reduce, or eliminate the FCOI.

The Investigator must update the Disclosure on an annual basis while a proposal is pending and during the period of an award, and also within 30 days of the acquisition of any new Significant Financial Interest.

#### Notifying NSF of Conflict Issues

If UNT is unable to satisfactorily manage a conflict of interest relating to research funded by the National Science Foundation, UNT will notify NSF of the circumstances.

Approved:  
Effective:

Procedure Owner: Research  
Procedure Contact: Research