INTRODUCTION

The National Science Foundation (NSF) and the Department of Health and Human Services, Public Health Service (HHS-PHS) have mandated that institutions submitting proposals for federal support for research or education activities have in place by October 1, 1995, a process for University Principal Investigator's or Project Directors to disclose significant financial conflict of interest.

POLICY

It is the policy of UW-Extension to fully comply with existing federal disclosure requirements to assure that the design, conduct, and reporting of research or other education activities will not be biased by any conflicting financial interest of Principal Investigators engaged in federally funded projects.

PROCEDURE

Principal Investigators (PIs) who submit proposals to Federal agencies that have special financial conflict of interest disclosure requirements must complete a UW-Extension Principal Investigators Financial Disclosure Form for Federal Grants (copy attached). The Departmental Chair must review, sign and forward these forms to the Dean/Director's office.

If no potential conflict of interest is found in the initial review of the PIs Financial Disclosure form, the Dean/Director's office will notify the Institutional Office of Extramural Support (OES) accordingly. The OES will accept proposals for federal funding from the PI without any further review in terms of conflict of interest.

If a potential for conflict of interest is found in the initial review of the PIs Financial Disclosure form, the Dean/Director's office will notify the PI, the respective department chair, and the OES. If the PI with a potential conflict of interest decides to submit a proposal to a federal sponsor, the proposal may be sent to the sponsor, but the PI must send concurrently an abstract of the proposal and an explanation of why there is no conflict (or an explanation of potential solutions to the conflict) to the Dean/Director's office.

Upon notification of award, but prior to any disbursements of award funds, the Dean/Director's office will bring the matter to the Vice Chancellor's Office for review. If the Vice Chancellor's office decides there is no conflict of interest the respective Dean/Director's office and the Office of Extramural Support will be notified that the award may be accepted without any further review in terms of conflict of interest. If the Vice Chancellor's office decides that a potential conflict of interest exists, a meeting with the PI and his/her Department Chair and Dean/Director will be requested. If a reduction, elimination, or management of the conflict can be agreed upon, the Vice Chancellor's Office will notify in writing the OES that the conflict of interest has been reduced, eliminated, or is being managed and that UW-Extension (on behalf of the Board of Regents) can accept the grant and expend award funds. The OES will report to the agency the existence of the conflict and provide assurance that the interest has been reduced, eliminated, or is being managed.

If the conflict cannot be resolved, the award cannot be accepted. The OES will notify the federal agency that the conflict has not been reduced or eliminated and cannot be managed. At this time, the Dean/Director and Department Chair could consider formally requesting the federal agency to approve a different PI. The replacement PI would also have to file a Financial Disclosure Form and be found to not have a conflict of interest.

The PI is required to update the disclosure form during the period of the award if new reportable significant financial interests are obtained.