C. USI Financial Conflict of Interest Policy

University of Southern Indiana

USI Investigator - Significant Financial Interest Disclosure Policy

Federal regulations require institutions of higher education to have policies and procedures in place that ensure that investigators disclose any significant financial interest that may present an actual or potential conflict of interest in relation to externally sponsored projects. Such disclosures must be made prior to the submission of the proposal for funding, and institutions must develop specific mechanisms by which conflicts of interest will be reviewed and satisfactorily managed, reduced, or eliminated prior to acceptance of an award. In addition, if a new reportable significant conflict of interest arises at any time during the period after the submission of the proposal through the period of the award, the filing of a disclosure is also required.

Applicability
This policy applies to all investigators and their spouse and dependent children. "Investigator" is defined as the principal investigator, project director, co-principal investigators, and any other person at the University who is responsible for the design, conduct, or reporting of research or educational activities funded, or proposed for funding, by an external sponsor.

Elements Subject to Disclosure
Each investigator must disclose all significant financial interests:

- that would reasonably appear to be directly and significantly affected by the research or educational activities funded, or proposed for funding, by an external sponsor; or
- in entities whose financial interests would reasonably appear to be directly and significantly affected by such activities.

"Significant financial interests" 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:
- salary, royalties, or other remuneration from the University;
- income from seminars, lectures, or teaching engagements sponsored by public or nonprofit entities;
- income from service on advisory committees or review panels for public or nonprofit entities;
- or financial interests in business enterprises or entities if the value of such interests do not exceed $10,000 (or $10,000 per annum if such interests represent salary, fees, or other continuing payments) or represent more than 5 percent ownership interest for any one enterprise or entity when aggregated for the investigator and the investigator's spouse and dependent children. Investigators who have secured a federal grant funding the maximum allowable financial interest is $5,000 per year.

Disclosure Procedures
In accordance with federal regulations, all investigators with a potential conflict of interest as described above will identify the fact and make complete disclosure of the conflict prior to submission of the proposal. Investigators will submit the Significant Financial Interest Disclosure Form to the Office of Grants and Sponsored Research with the submission of each external grant proposal.

Click here to download the Conflict of Interest Form

D. Faculty Workload Assignment Policy

The Faculty workload assignment policy and form were developed to track the time commitment of PI/PDs on sponsored projects. Tracking PI/PD time/effort ensures that a PI/PD’s effort does not exceed 100%. The Faculty Workload form is completed with the submission of each external grant proposal. See the complete Faculty Workload Assignment policy.

Click here to download the Faculty Workload Assignment Form

E. Budget Development

A proposed budget is simply a financial plan to accomplish the objectives outlined in the proposal narrative. It should include sufficient resources to fully execute the planned project.

Before you start preparing your budget:

- Review the funder’s guidelines
  - Identify grant restrictions
  - Determine if facilities and administrative (F&A) cost recovery is permitted and/or limited
  - Determine if cost share is required and if resources are available to meet this requirement.
- Review the proposal narrative and identify activities which require funding
- Assign activities to one of the following budget categories: salaries and wages, benefits, travel, supplies, contractual/consulting services, equipment, and other
- Estimate costs for each budget category
- Identify costs to be funded by the granting agency
- Identify costs to be funded with existing university resources (if required) and secure funding sources

Cost Categories

Costs may be classified as direct costs or facilities and administrative (F&A) costs.

Direct costs are those costs that can be identified specifically with a particular sponsored project, an instructional activity, or any other institutional activity, or that can be directly assigned to such activities relatively easily with a high degree of accuracy\(^1\).

Expenses that are allowable but do not meet the requirements of direct costs (easily identifiable with a high degree of accuracy) must be treated as F&A\(^2\). F&A costs are also known as indirect

\(^{1}\) Section D.1. of OMB Circular A-21