Conflict of Interest (Financial Disclosure) Policy


Financial Disclosure Policy

In order to assure the independence and impartiality of Eastern Connecticut State University’s outside supported teaching, research, and public service activities, and to comply with state and federal regulations pertaining to financial conflict of interest, this policy is promulgated and is intended to apply to all employees of Eastern Connecticut State University engaged in outside supported activities.

As a part of the grant/contract application process, Principal Investigators, Co-investigators and other grant/contract-supported staff must positively assert in writing on forms provided by the University, the absence of a financial or other interest or affiliation held by them or a member of their immediate family in the sponsoring organization or in companies from which goods and services will be obtained under the outside supported activity.

On the receipt of this form, the appropriate dean or vice president will certify that Eastern Connecticut State University has implemented a written and enforced conflict of interest policy that is consistent with the provisions of NSF Grant Policy manual Section 510 and Department of Health and Human Services’ (DHHS) conflict of interest policy contained in the Code of Federal Regulations 42CFR, part 50, subpart F, and 42CFR, part 90; and that to the best of his/her knowledge, all financial disclosures required by that conflict of interest policy have been made and all identified conflicts of interest will have been satisfactorily managed, reduced, or eliminated prior to the institution’s expenditure of any funds under the award. In cases involving state or federal grants or contracts, conflicts that cannot be satisfactorily managed, reduced or eliminated must be disclosed to the state or federal funding agency.

Should the dean or vice president determine that a potential conflict exists he/she will meet with the Principal Investigator to determine the extent of the conflict & resolve how it will be managed, reduced or eliminated prior to the institution’s expenditure of any funds under the award.

In addition, the Principal Investigator, Co-investigator and other grant/contract-supported staff must inform the University immediately if such a financial or other interest is subsequently assumed by them or a member of their immediate family.

The President of the University or designee will annually provide a copy of this policy to all Principal Investigators, Co-investigators and other grant/contract staff and it will be made a part of the Grant Handbook.

This policy will be reviewed annually and revised as needed to assure the complete financial objectivity of outside supported endeavors and the full compliance with current state and federal regulations.

– Professional Development, Funding, Research and Recognition 7.14 (Current as of 8/1/01)