THE
UNIVERSITY
OF RHODE ISLAND

Policy on Financial Conflict of Interest in Research

Policy Title	**Policy on Financial Conflict of Interest in Research**
Policy #	01.010.3
Policy Owner	University of Rhode Island Board of Trustees
Contact Information	Questions about this policy can be directed to the University of Rhode Island Director of Research Integrity at (401) 874-4813.
Approved By	University of Rhode Island Board of Trustees
Effective Date	November 6, 2026
Next Review Date	No later than November 30, 2030
Who Needs to Know About this Policy	All Employees of the University involved in the conduct, administration, or oversight of Research; as well as all Investigators associated with University Research regardless of professional affiliation.
Definitions	**Conflict-of-Interest Management Committee**. A committee established in accordance with the University of Rhode Island Board of Trustees Policy on Public-Private Partnership in Research and Development to advise the Designated Responsible Official on Financial Conflicts of Interest in Research. **Designated Responsible Official ("DRO").** The individual responsible for reviewing and addressing disclosures of Significant Financial Interest and managing Financial Conflicts of Interest as they relate to Research. For the purposes of this policy, the Designated Responsible Official will be the Vice President for Research and Economic Development at the University of Rhode Island. **Employee**. Any person employed by the University, including but not limited to faculty, staff, or a student worker; regardless of the source of funds from which they are paid. **Equity Interests**. Stock, stock options, warrants, and other existing or contingent ownership interests in a commercial entity. **Family Member**. For the purposes of this policy, the term Family Member refers to an Investigator's spouse and any dependent children. **Financial Conflict of Interest**. A Significant Financial Interest that could directly and significantly affect the design, conduct, or reporting of Research. **Financial Interest.** Anything of monetary value, whether or not the value is readily ascertainable.

Institutional Responsibilities. Investigator's responsibilities associated with their University of Rhode Island appointment or position, such as Research; teaching; service; support; and/or administration; conference attendance, Research presentations or lectures at other universities or uncompensated publication review; and certain internal and external professional committee service.

Investigator. Project director or principal Investigator and any other person, regardless of title or position, who is responsible for the design, conduct, or reporting of Research, which may include, for example, collaborators or consultants. Some sponsors have specific requirements for identifying Investigators.

Remuneration. Remuneration includes salary and payments for the provision of services, such as consulting fees, honoraria, paid authorship, and cash or in-kind gifts.

Research. A systematic investigation, including development, testing, and evaluation of ideas, designed to develop or contribute to general knowledge. Research includes all basic, applied, clinical, translational, demonstration and creative activities in all academic and scholarly fields including, but not limited to the arts, sciences, liberal arts, applied sciences, social sciences, and professions, including Research activities involving human subjects and animals.

Significant Financial Interest. Defined by the Public Health Service as a Financial Interest consisting of one or more of the following interests of the Investigator (and those of the Investigator's Family Members) that reasonably appears to be related to the Investigator's Institutional Responsibilities:

a. With regard to <u>any publicly traded entity,</u> any Remuneration received from the entity in twelve (12) months preceding disclosure exceeding five thousand dollars ($5,000) when aggregated, and any Equity Interest in the entity as of date of disclosure with a value exceeding five thousand dollars ($5,000) when aggregated. Equity Interest value is determined through reference to public prices or other reasonable measures of fair market value.
b. With regard to any <u>non-publicly traded entity</u>, any Remuneration received from entity in twelve (12) months preceding disclosure exceeding five thousand dollars ($5,000) when aggregated; and any Equity Interest held.
c. Intellectual property rights and interests (e.g., patents and copyrights) upon receipt of related income.
d. Travel of any value that is reimbursed or sponsored (i.e., that which is paid on behalf of the Investigator or their Family and not reimbursed to the Investigator so that the exact monetary value may not be readily available).

	Significant Financial Interests **do NOT include** a. salary, royalties, or other Remuneration paid by the University of Rhode Island to the Investigator if the Investigator is currently employed or otherwise appointed by the University of Rhode Island, including intellectual property rights assigned to the University of Rhode Island and agreements to share in royalties related to such rights; b. 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; c. 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; d. 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; or e. travel reimbursed or sponsored by federal, state, or local government agency, an institution of higher education as defined by 20 U.S.C. 1001(A), an academic teaching hospital, a medical center, or a Research institute affiliated with an institution of higher education.
Statutes, Regulations, and Policies Governing or Necessitating This Policy	Conflicts of Interest, Conflicts of Commitment, Organizational Conflicts of Interest, and Other Matters of Concern, 2 C.F.R. Part 910, Subpart C. Promoting Objectivity in Research, 42 C.F.R. Part 50, Subpart F. Responsible Prospective Contractors, 45 C.F.R. Part 94. U.S. National Science Foundation, Proposal & Award Policies & Procedures Guide. U.S. National Aeronautics and Space Administration, Conflict of Interest Policy for Recipients of NASA Financial Assistance Awards, 88 Fed. Reg. 5930 (Jan. 30, 2023). *Policy on Conflict of Commitment in Research.*
Reason for Policy/Purpose	To meet the requirements of federal regulations and policies regarding Financial Conflict of Interest in Research. To ensure that the University and its Employees participating in Research activities conduct themselves in accordance with federal regulations and policies with regards to Financial Conflict of Interest in Research.
Forms Related to this Policy	URI Research Significant Financial Interest and Outside Activity Disclosure Form

Policy Statement

The University of Rhode Island ("University") values outside activities that advance and communicate knowledge through interaction with government, industry, the community, and the public. A researcher's Financial Interest in a company or other organization (or that of their Family) may produce a real or perceived Financial Conflict of Interest if the Financial Interest could directly and significantly affect or appear to affect the design, conduct, or reporting of Research.

Investigators are required to disclose Significant Financial Interests. Disclosure enables the University to determine if a Significant Financial Interest creates a Financial Conflict of Interest or the appearance of a Financial Conflict of Interest. Effective management of a Financial Conflict of Interest depends on full and prompt disclosure.

The intent of this policy is to meet the requirements of applicable federal regulations and policies regarding Financial Conflict of Interest in Research.

This policy applies to ongoing and future activities as of the policy Effective Date. Completed purchases, past transactions, or past professional activities are subject to applicable University policies in place at the time those activities were undertaken.

The following additional policies related to conflicts of interest or commitment apply to individuals engaged in specific activities, and may prescribe corresponding pathways for self-disclosure and conflict management:

- The Policy on Conflict of Commitment in Research additionally applies to Employees engaged in sponsored research activities (and shares a common disclosure form);
- The Policy on Public-Private Partnership in Research and Development applies to Employees engaged in basic or applied Research and Development at the University;
- The Policy on Conflict of Interest and Commitment applies to all University Employees and guides compliance with the Rhode Island Code of Ethics; and
- The Policy on Consensual Relationships applies to Employees whose activity meets the definition of a consensual relationship as defined in that policy.

I. Applicability

This policy and its attendant procedures apply to any University Employee identified as an Investigator who receives and/or proposes to receive funding from external sources for Research at the University. The policy also applies to an Investigator's Family Members.

Collaborators, sub-contractors, sub-recipients, and visiting scientists that are identified as Investigators must either comply with this policy and its attendant procedures or provide a certification to the Director of Sponsored Projects at the University of Rhode Island that their institutions are in compliance with pertinent federal policies and that they in turn are in compliance with their own institutional policies.

II. Disclosure Process

Investigators must disclose Significant Financial Interests (1) before submitting an application for external funding, (2) at least annually thereafter, and (3) within 15 days of acquiring a new Significant Financial Interest. The Associate Vice President for Research Administration, in consultation with the DRO and the Conflict-of-Interest Management Committee, will design procedures for the reporting of Significant Financial Interests. Investigators are responsible for completing disclosures of Significant Financial Interests as described in the attendant procedures.

III. Training

All Investigators who receive and / or propose to receive funding from external sources for Research at the University must complete required training as described in the attendant procedures prior to engaging in the funded Research at the University, and at least every two (2) years thereafter. Investigators must also complete training within a period of time determined by the DRO if 1) this policy is substantively amended and 2) the DRO determines that the Investigator has not complied with this policy or with a management plan related to their Research.

IV. Review and Evaluation of Disclosures

The Associate Vice President for Research Administration, in consultation with the DRO and the Conflict-of-Interest Management Committee, will review disclosures as described in the attendant procedures. The intent of the review is to determine:

(1) whether the disclosed Significant Financial Interest(s) reasonably appear to be related to the externally-funded Research activity in which the Investigator is or proposes to be engaged;
(2) Whether the disclosed Significant Financial Interest(s) constitute real or perceived Financial Conflict(s) of Interest; and
(3) Whether the real or perceived Financial Conflict(s) of Interest should be managed or eliminated.

V. Management and Elimination of Financial Conflicts of Interest

If it is determined that a real or perceived Financial Conflict of Interest may be managed, the Associate Vice President for Research Administration will develop a draft management plan and submit it for review and approval as described in the attendant procedures.

The Investigator may not commence or participate in the Research that gives rise to the Financial Conflict of Interest, or the appearance thereof, until the management plan is fully approved and executed. Once approved, the Investigator must adhere strictly to all aspects of the management plan. Compliance with the management plan will be monitored as described therein.

If it is determined that a real or perceived Financial Conflict of Interest may not be managed, the Investigator must eliminate the Significant Financial Interest before commencing or participating in the Research that gives rise to the Financial Conflict of Interest.

VI. Appeals

If an Investigator believes that a determination regarding a Significant Financial Interest and / or a Financial Conflict of Interest is not appropriate or is based on erroneous information, they may request reconsideration by submitting a written request to the Associate Vice President for Research Administration. If, after a second review, the Investigator still wishes to appeal the decision, they may appeal to the Designated Responsible Official. The DRO's decision is final.

VII. Reporting

The Associate Vice President for Research Administration is responsible for reporting identified Financial Conflicts of Interest and any noncompliance with management plans in cases where federal regulation or the sponsor terms and conditions require reporting.

VIII. Retrospective Review

If the University discovers a Significant Financial Interest or Financial Conflict of Interest that was not identified in the disclosure and evaluation process, the Associate Vice President for Research Administration, in consultation with the DRO and the Conflict-of-Interest Management Committee, will conduct a retrospective review to determine if the Significant Financial Interest is a potential Financial Conflict of Interest and if any mitigating actions are required. This review and any required mitigation report will be conducted, documented, and submitted according to federal regulation or sponsor terms and conditions.

IX. Sanctions for Failure to Comply

Failure to comply with this policy or with an approved management plan will be subject to review by the DRO. If the DRO determines a policy violation has occurred, the Investigator may be subject to University discipline up to and including termination of external funding, limitation or revocation of authorization to request or receive external funding, and termination of appointment.

X. Public Accessibility

This policy document will be posted on the University's public website. If required to do so by federal or state law, or by sponsor terms and conditions, the University will make information regarding Financial Conflicts of Interest, including the management thereof, available to the public upon request.

XI. Record Retention

The Associate Vice President for Research Administration will retain all disclosures, conflict management plans, and related documents for a period of at least three (3) years following submission of the final expenditure report for the applicable project to the sponsor of the Research that gives rise to the Financial Conflict of Interest(s) unless any litigation, claim or negotiation, audit, or other action involving the records is commenced before expiration of the three (3)-year period, in which case, records will be retained until completion of the action and resolution of all issues.

Exceptions

None

Policy Review and Revisions

(Versions earlier than the first policy number may be paper only)

Policy #	Effective Date	Reason for Change	Changes to Policy
No Policy #. Title: "Conflict of Interest in Research Policy and Procedures"	February 2019	n/a	n/a
01.010.1	November 5, 2021	Update policy to reflect Board of Trustees	Language clarification; removal of procedures

01.010.2	November 7, 2025	Revised to align with the pending Board of Trustees Policy on Conflict of Interest and Commitment.	Updated to reflect current federal agency regulations and policies at the time of revision, with some procedural content moved to Procedures.
01.010.3	November 6, 2026	Updates to align with the DOE conflicts of interest regulation at 2 C.F.R. Part 910, Subpart C	Shortened the disclosure window to within 15 days of acquiring a new Outside Activity and reduced the re-training period to every 2 years.