

## Innovation for Poverty Action (IPA) Financial Conflict of Interest Policy

The purpose of this policy is to promote objectivity in research by establishing standards to ensure there is no reasonable expectation that the design, conduct or reporting of research funded under Public Health Services (PHS) grants, PHS cooperative agreements or any other funding source will be biased by any conflicting financial interest of an investigator [45 C.F.R. Part 50, Subpart F]. Please see: <http://grants.nih.gov/grants/policy/coi/index.htm>.

1. For subrecipients of PHS-funded research who follow IPA's PHS Conflict of Interest Policy, any person who is named as an investigator, .i.e, is responsible for the design, conduct, or reporting of the PHS-funded research project, must submit the PHS Financial Disclosure Form 1 at the time of application.
2. At the just-in-time stage of awarding process, IPA staff will contact Investigators who have disclosed any significant financial interests (SFI) to request more information. The COI Designated Official will review to determine whether or not the disclosed SFI is related to the research project.
3. IPA staff will consider whether the Investigator's SFI could directly and significantly affect the design, conduct or reporting of the PHS-funded research project. Please allow sufficient time for review.
4. Submission of PHS Financial Disclosure Form 1 is required (i) on an annual basis for non-competing continuation awards, (ii) when a new Investigator is added to the project, or (iii) when an Investigator's financial interests increase, whichever comes first. It is also required when an Investigator transfers PHS-funded research to IPA.

**Who is considered an "Investigator," and therefore required to disclose?** "Investigator" means the 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 funded by the PHS (e.g., NIH), or proposed for such funding.

**What is an entity?** *Entity* means any domestic or foreign, public or private, organization (excluding a Federal agency) from which an Investigator (and spouse and dependent children) receives remuneration or in which any person has an ownership or equity interest.

**What is a "Significant Financial Interest"?** A significant 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:

1. 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;
2. 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);
3. Intellectual property interest held by the Investigator, or Investigator's spouse or dependent children on a patent, patent application, or a copyright of software assigned or to be assigned to a party other than IPA upon receipt of income related to such rights and interests that exceed \$5,000 in 12 months preceding disclosure.
4. Any reimbursed or sponsored travel (i.e., that which is paid on behalf of Investigator and not reimbursed to Investigator so that the exact monetary value may not be readily available), related to institutional responsibilities. Excludes 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 Institution of higher education.

**What is not a "Significant Financial Interest"?** Significant financial interests do **not** include: (1) salary, royalties, or other remuneration paid by the Institution to the Investigator if the Investigator is currently employed or otherwise appointed by the Institution, including intellectual property rights assigned to the Institution and agreements to share in royalties related to such rights; (2) any ownership interest in the Institution held by the Investigator, if the Institution is a commercial or for-profit organization; (3) 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; (4) 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 (5) 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.

### Records

The information provided herein may be released or transmitted to the sponsor, including federal agency representatives. These records will be retained for 3 years after termination of sponsored project or until resolution of any action by the sponsor, whichever is greater.