

Conflict of Interest for Sponsored Awards	Procedure Number	11.2.3.1P
	Effective Date	October 05, 2026

1.0 PURPOSE

Ensuring the integrity of sponsored awards is critical to maintaining public trust and upholding the mission of the College. Federal regulations require institutions to identify, disclose, and manage any potential conflicts of interest that could compromise the objectivity or outcomes of sponsored awards. This document establishes procedures to identify, disclose, and manage potential conflicts of interest for all sponsored awards, particularly in situations where financial or personal interests may affect or appear to affect the professional judgment or performance of college personnel. This ensures that all sponsored awards meet the highest standards of ethical conduct and accountability.

2.0 REVISION HISTORY

Adopted on: 10/05/26

3.0 DEFINITIONS

- A. *Conflict of Interest* – A situation in which a college employee's financial or personal interests may compromise or appear to compromise their professional obligations and responsibilities to the college.
- B. *Project Manager/Principal Investigator* – Individual designated by the College to manage the sponsored award project.
- C. *Significant Financial Interest* - A financial interest that reasonably appears to be related to an employee's institutional responsibilities or sponsored award activities and requires disclosure under applicable sponsor regulations or College requirements.
- D. *Sponsored Award* – A sponsored award is the transfer of money or property from an external funder that requires performance of specific duties. The funding relationship usually reflects a joint partnership in setting/meeting project goals. Most governmental funding will be for the purpose of conducting a sponsored award. The funding mechanisms used to meet this purpose can include memoranda of understanding, grants, contracts, cooperative agreements, and other legally binding means of transfer.

4.0 PROCEDURES

- A. **Disclosure** - All employees participating in sponsored awards must complete a *Conflict of Interest Disclosure Form* identifying any potential conflicts of interest. The form is available on the Sponsored Awards Services virtual office and includes details and examples of information to disclose. Most importantly, employees must disclose any significant financial interest, as defined by this procedure and applicable sponsor requirements related to the sponsored award, as well as any personal, professional, or financial relationship that could reasonably appear to influence project decisions. The *Conflict of Interest Disclosure Form* must be submitted:
 - a. At the time of proposal submission,
 - b. Annually, for ongoing projects,

- c. Within 30 days of discovering or acquiring a new financial interest.

Failure to timely disclose a potential conflict of interest may require retrospective review and may result in corrective actions as appropriate.

- B. **Review** - Disclosure forms must be submitted to the Director of Sponsored Awards Services, who will be the first to review each form for completeness and to determine if a potential conflict of interest has been disclosed. All applicable disclosures garnering further review will be reviewed by both the Director of Sponsored Awards Services and the Vice President of Performance & Planning, to determine whether a conflict of interest exists, and what conditions or restrictions, if any, should be imposed to manage, reduce or eliminate such conflict of interest. Review criteria include whether the disclosed interest could directly and significantly affect the design, conduct, or reporting of the sponsored award, or whether the interest could undermine objectivity or lead to bias in decision-making. Conflicts involving senior administrators or disputes regarding conflict determinations may be referred to the College President for final review and determination.

Possible outcomes include:

- No Conflict: No further action required.
- Manageable Conflict: A written Conflict Management Plan will be developed that allows for the continued objective of the sponsored award. The Project Manager/Principal Investigator must agree to the plan (in writing) before the project can proceed. Examples of management strategies include:
 - Public disclosure of the conflict in presentations and publications.
 - Independent oversight or review of data and results.
 - Modification of personnel roles.
 - Severance of problematic relationships.
- Unmanageable Conflict: The individual may be recused from the project or specific project activities.

Conflict of Interest Disclosure Forms, review determinations, and management plans shall be maintained in the official sponsored award file. Such records will be treated as confidential and shared only with individuals who have a legitimate business need to access the information.

- C. **Monitor** - The Sponsored Awards Services Director and Project Manager/Principal Investigator are responsible for ensuring adherence to the management plan throughout the life of the project. When required by the funding agency (e.g., NIH, NSF), the College will report the existence of a conflict and provide assurances of proper management. Failure to disclose or comply with a management plan may result in:
 - Suspension of project participation.
 - Institutional disciplinary actions per College policy.
 - Required reporting to the sponsor.
- D. **Training** - All personnel involved in sponsored awards must complete Conflict of Interest training at the time of proposal submission and every four years thereafter. Additional training may be required when institutional requirements change or when noncompliance is identified. Training materials can be found

on the virtual office and include guidance on federal regulations and institutional expectations. Sponsored Awards Services will maintain documentation of training completion and make such records available for audit, monitoring, or compliance review as required.

- E. **Records** - The College shall maintain records of all financial disclosures and of all actions taken to resolve financial conflicts of interest for at least five years beyond the termination or completion of the sponsored award to which they relate, or until the resolution of any federal action involving those records, whichever is longer.