Augsburg College educates students to be informed citizens, thoughtful stewards, critical thinkers, and responsible leaders.

The Augsburg experience is supported by an engaged community that is committed to intentional diversity in its life and work. An Augsburg education is defined by excellence in the liberal arts and professional studies, guided by the faith and values of the Lutheran church, and shaped by its urban and global settings.

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**Financial Conflict of Interest (FCOI) for Investigators: Policy and Procedures**

**Responsible College Officer:** Provost

**Policy Owner:** Provost

**Policy Contact:** Director, Sponsored Programs

**Effective date/amended:** Approved: 10/11/2013 | Effective: 01/01/2014 | Revised: N/A

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### Purpose Statement

The purpose of this policy is to promote the integrity and credibility of research and sponsored activities conducted by Augsburg College Investigators. This will be accomplished by identifying actual or potential financial conflicts of interest (FCOI) and taking steps to manage, reduce or eliminate these conflicts.

A FCOI exists when it is determined that an Investigator has a significant financial interest that could directly and significantly affect the design, conduct, or reporting of research and/or sponsored activity.

This Policy establishes guidelines and procedures for reporting and managing FCOIs, as well as, complying with applicable federal and state requirements. It has been designed to meet Public Health Service (PHS) regulatory requirements as identified in 42 CFR 50 Subpart F and 45 CFR 94 and the National Science Foundation's (NSF) policy on conflicts of interest found in Chapter IV.A of the Awards and Administration Guide.

### Applicability and scope

This policy applies to all Augsburg Investigators (faculty, staff, students, or other individuals) involved in the design, conduct, or reporting of Sponsored Activities. Sponsored Activities include but are not limited to research, public service, instruction, and/or training activities funded by grants, contracts, cooperative agreements, and other sponsored agreements. This policy may also apply to a Sub-recipient (an individual or external entity receiving financial assistance from Augsburg to conduct a substantive portion of a Sponsored Activity) where funding is received from PHS and the Sub-recipient does not have an applicable policy and procedure.

This policy does not apply to faculty, staff, students, or other individuals who receive program designated operating grants or unrestricted awards and gifts. In cases where this policy is not applicable, Augsburg employees will be expected to adhere to the policies on Conflict of Interest and Conflict of Commitment as described in the Employee Handbook.

Failure to abide by this policy may result in disciplinary or other administrative action.

### Definitions

The following terms are defined for the purposes of this policy:

**Acting Official (AO):** the Director of Sponsored Programs.
Disclosure of significant financial interests: an investigator’s disclosure of significant financial interests to the college.

Equity interest: any stock, stock option, or other ownership interest, as determined through reference to public prices or other reasonable measures of fair market value.

Family: an Investigator’s immediate family, including spouse, registered domestic partner, and/or dependent children.

Financial Conflict of Interest: a significant financial interest that could directly and significantly affect the design, conduct, or reporting or research and sponsored activities.

Financial Conflicts of Interest Committee (FCOI Committee): an ad hoc committee assembled by the Institutional Official (IO) to serve as an advisory body on FCOI issues. The committee will review potential or actual conflicts of interest and create a plan to manage, reduce or eliminate these conflicts. Committee members will include the IO, Director of Sponsored Programs, and at the discretion of the IO, faculty, staff, and outside experts.

Financial interest: anything of monetary value, whether or not the value is readily determined.

Institutional responsibilities: an investigator’s professional responsibilities on behalf of the college. For faculty this includes teaching, research, service and other scholarly and professional activities. For staff this includes job-related activities.

Institutional Official (IO): the individual accountable for oversight of this policy and who has the authority to suspend related activities until FCOI are resolved or other appropriate action is implemented. At the college, this is the Provost or his/her designee.

Investigator: the project director (PD) or principal investigator (PI) and any other person, regardless of title or position, who is: responsible for the design, conduct, or reporting of sponsored research or proposals for such funding, and/or senior/key personnel in the grant application, progress report, or any other report submitted to a funding agency.

Management Plan/Manage: the action taken to address an identified FCOI, which can include reducing or eliminating the conflict of interest to ensure, to the extent possible, that the design, conduct and reporting will be free from bias. The management plan will be documented by the Acting Official or his/her designee.

Mitigation Report: the document created as the result of a FCOI that was not identified or managed properly. The mitigation report should include: the FCOI; a description of the impact of the bias on the research project and; the plan of action to eliminate or mitigate the effect of the bias.

Public Health Service (PHS): an entity of the U.S. Department of Health and Human Services (DHHS) which includes agencies such as the National Institutes of Health (NIH), Agency for Healthcare Research and Quality (AHRQ), Food and Drug Administration (FDA), Agency to Toxic Substances and Disease Registry, Centers for Disease Control and Prevention (CDC), Health Resources and Services Administration (HRSA), Indian Health Service, Substance Abuse and Mental Health Services Administration, Federal Occupational Health, Office of Public Health and Science, Commissioned Corps, and any other components of the PHS to which the authority involved may be delegated.

Research: a systematic investigation, study, or experiment designed to develop or contribute to generalizable knowledge. The term encompasses basic and applied research and product development, and includes any such activity for which research funding is available from a research grant, career development award, center grant, individual fellowship award, infrastructure award, institutional training grant, program project, or research resources award.

Significant Financial Interest (SFI): A financial interest consisting of one or more of the following interests held by the Investigator or the Investigator’s family that reasonably appears to be related to the Investigator’s institutional responsibilities:
1. **Publicly traded entities (i.e. whose shares are purchased on an open stock market):** A SFI exists if remuneration from or an equity interest in a singular publicly traded entity exceeds $5,000 in the twelve (12) months preceding a disclosure, when aggregated as of the date of disclosure. Remuneration includes 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. **Non-publicly traded entities (i.e. privately held companies):** A SFI exists if the value of any remuneration received in the twelve (12) months preceding a disclosure, when aggregated, exceeds $5,000; or when the Investigator holds any equity interest (e.g., stocks, stock options, or other ownership interests), whether or not it exceeds $5000.

3. **Intellectual property rights and interests (e.g., patents, copyrights):** A SFI exists upon receipt of any income related to such rights and interests.

4. **Sponsored Travel:** A SFI exists with the occurrence of any reimbursed travel, or sponsored travel (i.e., travel and incidentals paid on behalf of the Investigator and not reimbursed to the Investigator so that the exact monetary value may not be readily available), related to their institutional responsibilities. At a minimum, disclosure will include the purpose of the trip, name of the Sponsor or organizer, destination, and duration. The IO will determine if additional information is needed to determine whether the travel constitutes a SFI.

The term SFI does NOT include:

1. Salary, royalties, or other remuneration paid by the college to the Investigator if the Investigator is currently employed or otherwise appointed by Augsburg, including intellectual property rights assigned to Augsburg and agreements to share royalties related to such rights.

2. Income from certain 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.

3. Income from seminars, lectures, or teaching engagements, or income from service on advisory committees or review panels sponsored by a federal, state, or local government agency, an institution of higher education [as defined by the Higher Education Act 1965: 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.

4. Travel that is reimbursed or sponsored by a federal, state, or local government agency, an institution of higher education [as defined by the Higher Education Act 1965: 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.

*Sponsored activities:* all externally funded activities, including but not limited to research, public service, instruction, and/or training activities funded by grants, contracts, cooperative agreements, or other sponsored agreements.

*Sub-recipient:* an individual or entity external to the college that receives financial assistance from the college to conduct a substantive portion of a research project or sponsored activity. The sub-recipient is accountable to the college for the programmatic outcomes and compliance matters, which includes adherence to the college’s FCOI policy where funding is awarded by PHS or an entity with similar reporting and training requirements. A Sub-recipient may also be referred to as a sub-award, subcontractor, sub-grantee, collaborator, or consortium member.

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**Responsibilities**

It is the responsibility of all Investigators to read this policy and conduct their Research and Sponsored Activities in a manner that avoids or manages financial conflicts of interests. Additionally, Investigators must disclose any financial interests that could directly or indirectly affect the design, conduct, or reporting of
research and sponsored activity. Failure to abide by this policy may result in disciplinary or other administrative action.

The college will take all necessary steps to manage, reduce or eliminate any identified actual or potential FCOIs prior to the college’s expenditure of any funds under an award. The college will also certify to the funding agency, as required, the presence of identified FCOIs and the steps taken to satisfactorily manage, reduce or eliminate these conflicts.

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**Related Policies and Procedures**
Conflict of Interest and Conflict of Commitment, Employee Handbook

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**Forms**
Financial Interests Disclosure Form (Attachment B)

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**Attachments**
Attachment A: Instructions For Accessing CITI FCOI training
Attachment B: Financial Interests Disclosure Form
Attachment C: Financial Conflict of Interest Reports: Required Information
Attachment D: Documentation of Retrospective Reviews: Required Information
Attachment E: Written Responses to Public Requests

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**Additional Information**
National Science Foundation Award & Administration Guide, Chapter IV.A
U.S. Department of Health & Human Services’ Financial Conflict of Interest Policy
(http://grants.nih.gov/grants/policy/coi)

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**Sources**
42 CFR 50 Subpart F
45 CFR 94
National Science Foundation Award & Administration Guide, Chapter IV.A
# Table of Contents

**Investigator Responsibilities** ............................................................................................................. 6  
*Policy* .................................................................................................................................................. 6  
*Procedure* ............................................................................................................................................... 6  
Financial Disclosures ................................................................................................................................. 6  
FCOI Training ............................................................................................................................................ 6

**Institutional Responsibilities** .................................................................................................................. 6

*Policy* .................................................................................................................................................. 6  
*Procedure* ............................................................................................................................................... 7  
Dissemination of Information ..................................................................................................................... 7  
Conflict Review and Determination ............................................................................................................ 7  
Management of Financial Conflicts of Interest ........................................................................................... 7  
Monitor Investigators and Sub-recipients for Compliance ........................................................................ 7  
Sponsor Disclosure ...................................................................................................................................... 8  
Public Disclosure ........................................................................................................................................ 8

**Sub-Recipients** ...................................................................................................................................... 9

*Policy* .................................................................................................................................................. 9  
*Procedure* ............................................................................................................................................... 9

**Noncompliance** ....................................................................................................................................... 9

*Policy* .................................................................................................................................................. 9  
*Procedure* ............................................................................................................................................... 9

**Policy Violation and Disciplinary Action** ............................................................................................... 10

*Policy* .................................................................................................................................................. 10  
*Procedure* ............................................................................................................................................... 10

**Records Retention** ................................................................................................................................... 10

*Policy* .................................................................................................................................................. 10

Attachment A: *Instructions for accessing CITI FCOI training* ................................................................. 11  
Attachment B: *Financial Interests Disclosure Form* .................................................................................. 12  
Attachment C: *Financial Conflict of Interest (FCOI) Reports: Required Information* .............................. 14  
Attachment D: *Documentation of Retrospective Reviews: Required Information* ................................. 15  
Attachment E: *Written Responses to Public Requests* ............................................................................. 16
Investigator Responsibilities

Policy
Prior to applying for funding for research or sponsored activities, all Investigators must: 1) read and agree to abide by this policy; 2) complete and update financial disclosure forms according to the procedures described below; and 3) complete online FCOI training through the Collaborative Institutional Training Initiative (CITI). The college will not submit grant proposals on behalf of Investigators who have not met disclosure and training requirements as described in the procedures below.

Procedure
Financial Disclosures
All Investigators must submit completed Financial Interest Disclosure Forms (Attachment B) to the Office of Sponsored Programs according to the following schedule:

Initial Disclosure:
   a) Current Investigators (who have not previously disclosed at the college): within 3 months of the original date of this policy.
   b) Future Investigators (including those new to the college): prior to the submission of a proposal for funding.

Updates:
   a) Within 30 days of discovering or acquiring (e.g., through purchase, marriage or inheritance) any new significant financial interest; and
   b) Annually, during the month of September.

Forms: Blank Financial Interest Disclosure Forms (Attachment B) can be obtained from the Director of Sponsored Programs or found on the Sponsored Programs website (http://inside.augsburg.edu/grants)

FCOI Training
All investigators must complete the online CITI FCOI training according to the following schedule:

Initial Training:
   a) Current Investigators (who have not yet taken this training at the college): within 3 months of the original date of this policy.
   b) Future Investigators (including those new to the college): prior to the submission of a proposal for funding.

Mandatory Updates:
   a) Every four (4) years; and
   b) If the college revises its policy or procedures in any manner that affects the requirement of investigators, or
   c) If the Investigator is not in compliance with this policy or a FCOI management plan

The instructions for accessing the online FCOI training are found in Attachment A.

Institutional Responsibilities

Policy
The college will: 1) inform each Investigator and Sub-recipient of the college’s policy on financial conflicts of interest and the responsibilities regarding disclosure; 2) promptly review all completed Financial Interest Disclosure Forms and determine whether an identified significant financial interest meets the definition of a
Financial Conflict of Interest; 3) take reasonable steps to manage, reduce, and eliminate identified FCOIs; 4) take reasonable steps to ensure Investigator and Sub-recipient compliance with this policy; and 5) disclose FCOIs to sponsors and the public as required.

**Procedure**

**Dissemination of Information**
The Office of Sponsored Programs shall inform each investigator applying for funding for research or other sponsored activities of: the college’s policy on financial conflicts of interest; the Investigator’s responsibilities regarding the disclosure of significant financial interests; and any applicable federal regulations regarding financial conflicts of interest. This information shall also be available on the Sponsored Programs website (http://inside.augsburg.edu/grants).

For situations in which the college carries out research through a Sub-recipient that is funded by PHS or an agency with similar FCOI reporting and training requirements, the college will notify the Sub-recipient of its responsibility to comply with FCOI regulations. If the Sub-recipient does not have an active policy regarding FCOIs that meets PHS or the funding agencies requirements, the Sub-recipient will be notified that they will be required to follow the college’s FCOI policy and procedures.

**Conflict Review and Determination**
The Acting Official or designee will promptly review all completed Financial Interest Disclosure Forms and determine whether an identified significant financial interest meets the definition of a FCOI.

The following questions may guide determination:

a) Would the Investigator risk a financial loss depending on the outcome of the research?

b) Are there potential financial gains to the Investigator based on the outcome of the research?

c) If the entity in question or the Investigator’s relationship with that entity stands to benefit from the research (as a vendor, sub-recipient or otherwise interested party), is there a compelling scientific or technical reason for such a relationship?

d) Would there be cause for a reasonable person to question the Investigator’s ability to be objective in conducting and reporting the research?

The Acting Official may consult the Institutional Official, FCOI Committee, or outside experts to support the determination of a FCOI.

**Management of Financial Conflicts of Interest**

Upon identification of a FCOI, the Acting Official will notify the Institutional Official. The Institutional Official will review the FCOI and assemble the FCOI Committee. The FCOI Committee will establish and document a plan for reducing or eliminating the conflict. The plan may include one or more of the following strategies:

a) Monitoring of research by independent reviewers;

b) Modifying the research plan;

c) Disqualifying Investigator from participation in the portion of the project that would be affected by significant financial interests;

d) Divesting by Investigator of significant financial interests;

e) Severing relationships that create conflicts; or

f) Publicly disclosing the FCOI.

The FCOI Committee will discuss the features and implementation of the Management Plan with the Investigator. The Investigator must agree, in writing, to the Management Plan before the project can proceed, and a copy of the plan will be held by both the Investigator and the Acting Official. As required, Managements Plans will be provided to Sponsors. If the FCOI Committee and Investigator cannot agree upon a Management Plan, the relevant regulatory bodies and funding agencies will be notified.

**Monitor Investigators and Sub-recipient for Compliance**
The Acting Official or designee will take reasonable steps to ensure Investigator and Sub-recipient compliance with this policy.
Investigator Compliance
   a) Verify that current Financial Interest Disclosure forms are on file and training requirements are up to date prior to submitted applications for funding.
   b) Verify that current Financial Interest Disclosure forms are on file and training requirements are up to date prior to the expenditure of awarded funds.

Sub-recipient Compliance
   If the research is funded by PHS or an agency with similar FCOI reporting and training requirements, the Acting Official will establish a written agreement with the Sub-recipient that certifies:
      a) compliance with FCOI regulations (either through their own policy and procedures or by indicating they intend to adhere to the college’s FCOI policy and procedure);
      b) Sub-recipient Investigators have current disclosures on file and documented training; and
      c) Sub-recipient will report to the college all identified FCOIs for a specified period of time that will enable the college to provide timely FCOI reports to PHS as required by federal law or to other agencies requiring such reports.

Sponsor Disclosure
   To the extent permitted by law, Financial Interest Disclosure Forms, Management Plans and related documents will be confidential. However, under certain circumstances, the College may be required to share information with sponsors or the public. The Investigator will be informed of any disclosure.

   Initial Disclosure:
      Prior to the expenditure of any funds for a PHS-funded research project (or sponsored project with similar reporting and training requirements), the college will report any identified significant financial interest that meets all three of the following criteria:
      1. Was disclosed and is still held by the Investigator;
      2. Was determined to be related to the PHS-funded research (or a sponsor with similar reporting and training requirements); and
      3. Was determined to be a FCOI.

   Annual Disclosure:
      For ongoing PHS-funded research, the college will submit annual reports regarding FCOIs submitted in the twelve (12) months prior according to guidelines established by PHS. Annual reports will provide the status of each FCOI, whether the conflict is still being managed or an explanation of why it no longer exists, and if applicable, any changes to the management plan.

   New/Updated Disclosure:
      The college will report to PHS a new FCOI within 60 days of identification. The report will contain the information in Attachment C and a statement that the information is current as of the date of the correspondence and subject to updates on at least an annual basis.

Public Disclosure
   The college will maintain public accessibility to relevant FCOI information by:
      a) Posting the current FCOI Policy and Procedure guide on Augsburg’s publicly accessible grants website (http://inside.augsburg.edu/grants/)
      b) Responding in writing within five (5) business days to any request for information concerning identified significant financial interests meeting all three the following criteria: 1) was disclosed and is still held by the Investigator; 2) was determined to be related to PHS-funded research (or a sponsor with similar reporting and training requirements); and 3) was determined to be a FCOI. The response will be limited to the information found in Attachment E.
      c) In the event of documented non-compliance involving a PHS-sponsored clinical research project evaluating the safety or effectiveness of a drug, medical device, or treatment, the Investigator must disclose the FCOI in each public presentation of the results of the affected research and request an addendum to previously published presentations.
Sub-Recipients

Policy
The college is responsible for ensuring all sub-recipients comply with applicable federal regulations regarding FCOI when funding is received from PHS or a sponsor with similar FCOI reporting and training requirements.

Procedure
The college will establish a written agreement with each sub-recipient that specifies whether this policy or the applicable policy of the sub-recipient's institution, will apply to sub-recipient Investigators. In the event the policy of the sub-recipient institution applies, the sub-recipient must certify that the policy complies with current FCOI regulations and that sub-recipient investigators have current disclosures on file, with documented training. The sub-recipient agreement will also specify the timing for reporting of FCOIs by sub-recipients to the college to enable timely review and reporting with funding agency requirements.

Noncompliance

Policy
Noncompliance exists when a FCOI was not identified or managed appropriately due to failure to complete one of the following: disclose a significant financial interest determined to be a FCOI; appropriately review or manage a FCOI; or comply with a documented Management Plan for a FCOI. In cases of noncompliance, the FCOI Committee will complete and document a retrospective review of the Investigator's and project activities within 60 days of the determination of noncompliance to evaluate whether there was bias in the design, conduct or reporting of research or sponsored activities.

Procedure
Upon determination of noncompliance, the following steps will be carried out:

1. Institutional Official will assemble the FCOI Committee within 60 days of the determination of noncompliance to complete a Retrospective Review of the Investigator's activities and project. The FCOI Committee will determine whether any research conducted during the time period of the noncompliance was biased in design, conduct, or reporting;

2. The FCOI Committee will document the Retrospective Review including, at a minimum, the elements contained in Attachment D;

3. If the project is funded by PHS or a sponsor with similar FCOI reporting and training requirements, the Acting Official will update the previously submitted FCOI Report, specifying the actions taken to manage the FCOI going forward;

4. If the project is funded by PHS or a sponsor with similar FCOI reporting and training requirements AND if bias is found, the Acting Official will notify the sponsor and submit a Mitigation Report that includes: elements documented in the retrospective review; a description of the impact of the bias on the research project; and the plan of action to eliminate or mitigate the effect of the bias.

5. Acting Official will continue to submit annual/updated reports.

In cases of noncompliance where the research is not funded by PHS and/or where no bias is found, the college is not required to notify PHS.
Policy Violation and Disciplinary Action

Policy
Violation of this policy by an Investigator or other employee of the college is grounds for discipline or other administrative action. The Institutional Official is responsible for determining and implementing sanctions on Investigators who have violated this policy. Actions that violate this policy include: intentionally reporting incomplete, misleading, or erroneous information on a Financial Interests Disclosure form; failure to make a required disclosure of a known significant financial interest; and failure to abide by the terms of an agreed upon Management Plan.

Procedure
Upon discovery of a violation of this policy, the following steps will be taken:

1. The Institutional Official will provide a written document to the Investigator within twenty-one (21) calendar days explaining the recommended sanctions to take place. Actions will be determined by the seriousness of the violation and may include, but is not limited to, one or more of the following:
   a. Removal from the activity;
   b. Special monitoring of future work;
   c. Letter of Reprimand;
   d. Probation with conditions specified; and/or
   e. Termination
2. A copy of the notification of sanctions will be provided to the President, FCOI Committee, Acting Official, and Institutional Review Board, where applicable.
3. The Acting Official will promptly notify the sponsoring agency of the violation and the action taken or to be taken, according to NSF, PHS, and other applicable federal regulations.
4. The Institutional Official will inform the Investigator of the right to appeal the decision. Investigators choosing to appeal must provide written statement to the president with the grounds for appeal within thirty (30) working days of the notification of sanctions. Upon receipt of a written appeal, the president shall evaluate the evidence and make a determination and inform all parties of the decision within thirty (30) working days.

Records Retention

Policy
The Office of Sponsored Programs will retain all FCOI Disclosure forms, Management Plans, and related documents and records for a period of seven (7) years from the date the final expenditure report is submitted to the sponsoring agency, or the resolution of any government action involving those records, or where applicable, from other dates specified in 45 CFR 74.53(b) and 92.42(b) for PHS supported research or other agency regulations. At the end of the Retention Period, all applicable documents will be destroyed.
New Users

1. Open your internet browser and go to https://www.citiprogram.org/
2. Click on the "Register Here" link.
3. Select Augsburg College from category titled, “Participating Institutions.” Click “Continue to Step 2.”
4. Enter name and email information. Click “Continue to Step 3.”
5. Create a username, password, and security question. Click “Continue to Step 4.”
6. Enter gender, race, and ethnicity questions. Click “Continue to Step 5.”
7. Answer questions regarding CEUs. Students should select “No”; Faculty and Staff should decide based on their appointment and credentialing requirements. Your response to this question will not impact your access to this course and can always be updated at a later date. Click “Continue to Step 6.”
8. Complete required fields. Under role, select the role most relevant to your work at Augsburg. Click “Continue to Step 7.”
9. Curriculum Selection: Answer questions 1 to 4 based on the description that is most relevant to your work. Select “YES” as your response to Question 5: Conflicts of Interest.
10. Click “Complete Registration.”
11. Click “Finalize Registration.”
12. You should see a course titled “Conflict of Interest.” Click on the title to begin taking this course’s first module.
13. Complete the Integrity Assurance Statement.
14. Complete the required modules. This should take you approximately 40 minutes. Your course progress can be saved allowing completion over multiple sittings.
15. Once you complete the course, a Completion Report will be generated. Save this document for your records. The Office of Sponsored Programs will also receive a copy of this report, which will serve as the official record of training.

Note: For the purpose of this policy, only the “Conflict of Interest” course is required; additional course offerings are considered optional.

Registered Users

1. Open your internet browser and go to https://www.citiprogram.org/
2. Log in with your username and password.
3. If Augsburg College is already listed as your affiliated institution, skip to Step 4.
   a. If Augsburg College is not listed, select “Affiliate with another institution” and follow “New Users” steps 3 through 15.
4. Click on Augsburg College Courses to open the course menu.
5. You should see a course titled “Conflict of Interest.” Click on the title to begin taking this course’s first module and skip to Step 6.
   a. If you do not see “Conflict of Interest” listed, Click “Add a Course.”
   b. Under Question 5: Conflict of Interest, select “YES.”
   c. You should now be able to see the Conflict of Interest course listed. Click on the title.
6. Complete the Integrity Assurance Statement.
7. Complete the required modules. This should take approximately 40 minutes. Your course progress can be saved allowing completion over multiple sittings.
8. Once you complete a course, a Completion Report will be generated. Save this document for your records. The Office of Sponsored Programs will also receive a copy of this report, which will serve as the official record of training.

Note: For the purpose of this policy, only the “Conflict of Interest” course is required; additional courses are considered optional.
Attachment B: Financial Interests Disclosure Form

Financial Conflicts of Interest Disclosure Form

In accordance with Augsburg College's policy on Financial Conflicts of Interest, as well as federal, state, and applicable sponsor requirements (42 CFR 50 Subpart F, 45 CFR 94, and Chapter IV.A of NSF’s AAG), all investigators must disclose their personal significant financial interests and those of their family (spouse, registered domestic partner, and/or dependent children) related to their institutional responsibilities.

For the purpose of completing this form, the following definitions apply:

Investigator: the project director (PD), principal investigator (PI), and any other person, regardless of title or position, who is responsible for the design, conduct, or reporting of sponsored research or proposals for such funding or is a senior/key personnel in the grant application, progress report, or any other report submitted to a funding agency.

Institutional Responsibilities: an investigator's professional responsibilities on behalf of the college. For faculty this includes teaching, research, service and other scholarly and professional activities. For staff this includes job-related activities.

For more information, please refer to the complete policy, which can be found at: http://inside.augsburg.edu/rgas/. or requested from the Office of Sponsored Programs.

Complete Name ___________________________ Department ___________________________ Email ___________________________

Disclosure Type:  

- [ ] Annual —> For the Period: September 20___ to August 20___
- [ ] Update —> To the disclosure dated: ________________

Please answer the following questions to the best of your knowledge as they relate to your institutional responsibilities.

**Income and Equity Interests in a Publicly Traded Entity**
1. In the past 12 months, have you, your spouse or registered domestic partner, and/or dependent children received income or own equity interest in any publicly traded entity related to your institutional responsibilities that, when aggregated, exceeds $5,000?
   
   [ ] Yes  [ ] No

**Income and Equity Interests in a Non-Publicly Traded Entity**
2. In the past 12 months, have you, your spouse or registered domestic partner, and/or dependent children received income or payment for services in any non-publicly traded entity related to your institutional responsibilities that, when aggregated, exceeds $5,000?
   
   [ ] Yes  [ ] No

3. In the past 12 months, have you, your spouse or registered domestic partner, and/or dependent children owned or acquired any equity interest in any non-publicly traded entity related to your institutional responsibilities?
   
   [ ] Yes  [ ] No

   Equity interest includes any stock, stock option, or other ownership interest. There is no minimum threshold for equity in non-publicly traded entities.

**Intellectual Property**
4. In the past 12 months, have you, your spouse or registered domestic partner, and/or dependent children received any payment for intellectual property rights and interests (e.g., patents and copyrights) related to your institutional responsibilities that when aggregated, exceeds $5,000?
   
   [ ] Yes  [ ] No

   This does not include intellectual property rights assigned to Augsburg and agreements to share royalties in such rights.

**Sponsored Travel**
5. In the past 12 months have you, your spouse or registered domestic partner, and/or dependent children been sponsored or received reimbursement for travel related to your institutional responsibilities?
   
   [ ] Yes  [ ] No

   Sponsored travel includes travel and incidentals paid on behalf of the Investigator and not reimbursed to the Investigator. This does not include travel that is reimbursed or 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.

☐ If you answered "yes" to any of the above questions, check this box and continue to next page.

☐ If you answered "no" to all of the above questions, please check this box, digitally sign and date, and then save a version to your computer using the following naming convention: last name. POC Disclosure. Month. Year. Then, attach this document to an email (from your institutional account) and send to swift@augsburg.edu

**(Certification)**
I certify that: 1) I have read and agree to abide by Augsburg College's policy on Financial Conflicts of Interest; 2) I have completed this report and to the best of my knowledge, the content is complete and accurate; 3) I acknowledge my responsibility to disclose any new significant financial interests within 30 days of discovering or acquiring the interest; and 4) I agree to comply with the college's efforts to manage, reduce, or eliminate any identified conflicts of interest.

Date ___________________________ Signature ___________________________

[Signature prompt: follow the prompts to create a digital signature. Or, certify via email by typing the certification language (above) in the body of the submission email.]

Financial Conflict of Interest Policy | Page 12 of 16
Financial Conflicts of Interest Disclosure Form

Please use this form to provide additional information regarding any significant financial interests related to your institutional responsibilities.

### Income and Equity Interests
If you answered "yes" to questions 1, 2 or 3, please complete the following table. Refer to questions 1, 2, and 3 for a detailed list of exclusions.

<table>
<thead>
<tr>
<th>Entity Name</th>
<th>Entity Type</th>
<th>Income ($)</th>
<th>Stock and/or Stock Options</th>
<th>If this is an updated report, was the interest acquired in the last 30 days?</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
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</tbody>
</table>

**Add Entity**  **Remove Entity**

### Intellectual Property Interests
If you answered "yes" to question 4, please complete the following table. Refer to question 4 for exclusions.

<table>
<thead>
<tr>
<th>Brief Description of IP Interest</th>
<th>Estimated Royalties &amp; Income ($)</th>
<th>Other Entities Holding Interest</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td></td>
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</tbody>
</table>

**Add Interest**  **Remove interest**

### Sponsored Travel
If you answered "yes" to question 5, please complete the following table. Refer to question 5 for additional exclusions.

<table>
<thead>
<tr>
<th>Travel Type</th>
<th>Sponsoring Entity</th>
<th>Destination (if unknown, indicate domestic or foreign)</th>
<th>Duration</th>
<th>Purpose</th>
<th>If this is an updated report, did the travel take place in the last 30 days?</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
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</table>

**Add Travel**  **Remove Year**

### Certification
I certify that: 1) I have read and agree to abide by Augsburg College’s policy on Financial Conflicts of Interest; 2) I have completed this report and to the best of my knowledge, the content is complete and accurate; 3) acknowledge my responsibility to disclose any new significant financial interests within 30 days of discovering or acquiring the interest; and 4) agree to comply with the college's efforts to manage, reduce, or eliminate any identified conflicts of interest.

**Date**  **Signature**

Please note: This document will be reviewed at the time of each proposal submission. If a disclosed significant financial interest appears to be a conflict of interest, additional information may be requested to further understand the interest. Where relevant, a management plan will be created to reduce or eliminate the conflict according to the procedures indicated in the college's policy on Financial Conflicts of Interest. Additionally, the information provided in this form may be released to the sponsor, federal agency, and/or public per procedures identified in the policy.

To submit this form, please digitally sign, date, and then save a version to your computer using the following naming convention: Last Name, FCOI Disclosure, Month, Year. Then, attach this document to an email (from your institutional account) and send to swift@augsburg.edu.
Attachment C: Financial Conflict of Interest (FCOI) Reports: Required Information

FCOI reports must include the following:

1. Project number;
2. PD/PI (or Contact PD/PI if multiple PD/PIs);
3. Name of Investigator with the FCOI;
4. Name of the entity with which the Investigator has a FCOI;
5. Nature of the financial interest (e.g., equity, consulting fee, Travel reimbursement, honorarium);
6. Value of the financial interest (dollar ranges are permissible):
   a. $0-$4,999;
   b. $5,000-$9,999;
   c. $10,000-$19,999;
   d. amounts between $20,000-$100,000 by increments of $20,000;
   e. amounts above $100,000 by increments of $50,000; or
   f. a statement that the interest is one whose value cannot be readily determined through references to public prices or other reasonable measures of fair market value.
7. A description of how the financial interest relates to the federally-funded research and the basis for the determination that the financial interest conflicts with such research;
8. A description of the key elements of the Management Plan, including:
   a. Role and principal duties of the conflicted Investigator in the research project;
   b. Conditions of the management plan;
   c. How the Management Plan is designed to safeguard objectivity in the research project;
   d. Confirmation of the Investigator’s agreement to the Management Plan;
   e. How the Management Plan will be monitored to ensure Investigator compliance; and
   f. Other information as needed.
Attachment D: Documentation of Retrospective Reviews: Required Information

Documentation of retrospective reviews must contain the following:

1. Project number;
2. Project title;
3. PD/PI or contact PD/PI if a multiple PD/PI model is used;
4. Name of the Investigator with the FCOI;
5. Name of the entity with which the Investigator has an FCOI;
6. Reason(s) for the retrospective review;
7. Detailed methodology used for the retrospective review (e.g., methodology of the review process, composition of the review panel, documents reviewed);
8. Findings of the review; and
9. Conclusions of the review.
Attachment E: Written Responses to Public Requests

Information contained within written responses to public requests will be limited to the following:

1. The Investigator’s name;
2. The Investigator’s title and role with respect to the research project;
3. The name of the entity in which the SFI is held;
4. The nature of the SFI;
5. The approximate dollar value of the SFI (dollar ranges are permissible):
   a. $0–$4,999; $5,000–$9,999;
   b. $10,000–$19,999;
   c. amounts between $20,000–$100,000 by increments of $20,000;
   d. amounts above $100,000 by increments of $50,000; or
   e. a statement that the interest is one whose value cannot be readily determined through reference to public prices or other reasonable measures of fair market value.
6. General Statement about how the SFI is being managed.