



**Nova Southeastern University
Standard Operating Procedure for GCP**

Title: <u>Financial Conflict of Interest</u>		Version # 1
SOP Number: OCR-FC-001	Effective Date: August 2013	Page 1 of 2

PURPOSE: A conflict of interest exists when the University, through procedures described herein, reasonably determines that a significant financial interest could affect directly and significantly the design, conduct, or reporting of sponsored projects

POLICIES:

1. A potential conflict of interest occurs when there is a divergence between an individual's private interests and his or her professional obligations to Nova Southeastern University (NSU) such that an independent observer might reasonably question whether the professional actions or decisions of an individual is determined or influenced by considerations of personal gain, financial or otherwise. An actual conflict of interest depends on the situation and on the character or actions of the individual. For the purposes of NSU Office of Sponsored Programs Policy (OSP) #16, Financial Conflicts of Interest in Sponsored Programs, a conflict of interest exists when the University, through procedures described herein, reasonably determines that a significant financial interest could affect directly and significantly the design, conduct, or reporting of sponsored projects.
2. The increasing involvement of academic researchers and educators with industry and private entrepreneurial ventures has raised the potential for conflict of interest. Such real or apparent conflicts, when not appropriately disclosed and addressed, can undermine public and professional confidence in the integrity of University research and sponsored programs.
3. In accordance with Federal regulations, NSU has a responsibility to manage, reduce, or eliminate any actual or potential conflicts of interest that may be present in a Study Team. OSP Policy #16, Financial Conflicts of Interest in Sponsored Programs, is intended to meet the federal requirements governing disclosure, management and reporting of

financial conflicts of interest (FCOI's). Complying with the policy ensures that potential conflicts are disclosed to the University and that the University manages, reduces, or eliminates FCOI's and reports them to the sponsors so there is a reasonable expectation that the research is unbiased and the public trust is preserved.

3.1. University Official

The Vice President for Research and Technology Transfer is the designated University official for review of financial disclosures by Investigators and for determining whether any significant financial interest is related to the sponsored program and, if so, whether a financial conflict of interest exists.

3.2 Applicability

The policy is applicable to Investigators/Study Team members on sponsored programs funded by, or proposed to, the Public Health Service (NIH, HRSA, CDC, AHRQ, SAMHSA, and others), the National Science Foundation, and any other governmental agency if they have promulgated regulations requiring investigator disclosure of financial interests or institutional policies related to conflicts of interest on sponsored projects.

- http://www.nova.edu/osp/forms/compliance_conflict_interest.pdf