

Date: June 30, 2009

To: Deans, Associate Deans, Department Chairs
Principal Investigators and Senior Research Staff

From: William Feyerherm, Vice Provost for Research and Sponsored Projects

Subject: New Financial Conflict of Interest Process

Background In June 2008, the internal audit division of OUS reported that adequate procedures for identifying and managing conflict of interest were not in place at PSU, particularly with regard to individuals involved in externally funded grants and contracts. Since that time, ORSP staff and a small group of faculty (including the presiding officer of the Senate) have worked to craft an interim COI process that was piloted in one department at PSU and for a small number of individuals with potential conflict of interest. In addition to requirements of the state auditors, in order for PSU to receive federal stimulus dollars and other federal funding, we must require that all PIs and senior researchers involved in sponsored projects sign an annual financial conflict of interest form and develop a management plan for any perceived conflict.

New COI Process: The new requirement is focused on the disclosure, management, and resolution of significant financial interests and requires annual disclosure by Principal Investigators (PIs) and those individuals the PIs designate as senior research staff. These are staff who are *responsible* (as determined by the PI) for the design, conduct, and reporting of the sponsored project at the PSU. Beginning July 1, 2009, Principal Investigators will indicate senior research staff or 'responsible' individuals on the PIAF during the proposal submission process to ORSP.

The new FCOI Annual Disclosure Form is one page in length and asks only one question to establish whether a significant financial interest exists. If the answer is affirmative, a more detailed FCOI Disclosure Attachment (2 pages) must be submitted to address federal requirements. We will begin implementation of this process by collecting the FCOI Annual Disclosure Form from all PI's and senior research staff identified on PIAFs submitted beginning July 1, 2009. In September, 2009, we will collect an Annual Disclosure Form from all remaining PIs and senior research staff who are involved with a sponsored project at PSU. Hereafter, a new Annual Disclosure Form will be collected from PI's and senior research staff during the month of September of each year.

Additional Information and Assistance: Please share this Conflict of Interest update with all faculty members involved with sponsored research or programs. These requirements are only for sponsored projects and conflict of interest. Other requirements to disclose and manage conflict are not altered by this new process.

The forms and other descriptive information may be viewed and downloaded from the ORSP website at http://www.rsp.pdx.edu/compliance_conflict.php. For additional help, you may contact Cathleen Gal, cgal@pdx.edu or Nancy Koroloff, koroloff@pdx.edu, or talk with any member of the ORSP staff. Your cooperation is greatly appreciated.