

PACE UNIVERSITY
POLICY AND PROCEDURES ON FINANCIAL CONFLICT OF INTEREST
IN RESEARCH
Effective August 16,

II. Scope of Policy

This Policy shall apply to Research projects funded in whole or in part by a grant, cooperative agreement or contract from any component of the PHS (including NIH), and/or the NSF. This Policy shall also apply to any non-grant sponsored Research projects with an external entity, which shall include but not be limited to, any studies, services, and research performed by an agreement or contract with the University involving non-University funds or services. This policy will also apply to all investigators submitting applications to the Institutional Review Board for human subjects research and to members of the Institutional Review Board.

Notwithstanding the preceding sentence, this Policy shall not apply to Small Business Innovative Research (SBIR) and Small Business Technology Transfer (STTR) Phase I awards

constitutes a Financial Conflict of Interest. The URO is currently the Associate Provost for Research (OR).

B. Investigator

Any individual responsible for the design, conduct, or reporting of the results of work performed or to be performed under a Research project covered by this Policy. This includes the

from the entity in the 12 months preceding the disclosure and the value of any equity interest (including any stock, stock option, or other ownership interest, as determined through reference to public prices or other reasonable measures of fair market value) in the entity as of the date of disclosure, when aggregated, exceeds \$5,000.

- With regard to any non-publicly traded entity, a Significant Financial Interest exists if the value of any remuneration (salary or other payment for services) received from the entity in the 12 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 (including any stock, stock option, or other ownership interest) in the entity.
- Intellectual property rights and interests (e.g. patents, copyrights), upon receipt of income related to such rights and interests.
- The occurrence of any reimbursed or sponsored travel (i.e., that which is paid on behalf of the Investigator and not reimbursed to the Investigator so that the exact monetary value may not be readily available).

Notwithstanding the foregoing, the term Significant Financial Interest does not include:

- ~~Salary~~

H. Financial Conflict of Interest

A Financial Conflict of Interest means a Significant Financial Interest that could directly and significantly affect the design, conduct or reporting of a Research project covered by this Policy.

I. Research means any systematic investigation, study or experiment designed to develop or contribute to generalizable knowledge relating broadly to public health, including behavioral and social-sciences research. The term encompasses basic and applied research (e.g., a published article, book or book chapter) and product development (e.g., a diagnostic test or drug).

V. Disclosure Requirement

For each Research project application covered under the terms of this Policy, Investigators must fully disclose all Significant Financial Interests (defined above). The Office of Research will alert the Principal Investigator if any of the Investigators on the project who are of the Investigators on t

b. Provide the name of each entity in or with which the Investigator has a Significant

of Interest. Conditions or restrictions that may be imposed to manage or eliminate Financial Conflicts of Interest include, but are not limited to:

- a. Public disclosure of the Significant Financial Interest(s) (e.g., disclosure of the interest in connection with publications or presentations arising from the Research project);
- b. For Research projects involving human subjects, disclosure of the Significant Financial Interest(s) directly to participants;
- c. Monitoring of the Research project by independent reviewers;
- d. Modification of the Research or project plan;
- e. Change of personnel or personnel responsibilities, or disqualification from participation in all or a portion of the Research project;
- f. Divestiture of the Significant Financial Interest(s); and/or
- g. Se()]Sct

VIII. Reporting

Prior to the University's expenditure of any funds from an award in support of a Research Project subject to this Policy, the University shall provide the funding agency with an initial Financial Conflict of Interest report ("FCOI Report"), in such form and substance as required by the funding agency, containing details of each Financial Conflict of Interest that has not been eliminated.

If, during the course of a Research project, the University identifies a Financial Conflict of Interest for existing or newly participating Investigators, a FCOI Report confirming implementation of a management plan must be filed with the funding agency within 60 days. In addition, where the FCOI Report involves a Significant Financial Interest that was not disclosed timely by an Investigator or, for whatever reason, was not previously reviewed in accordance with this Policy, and if bias is found to have occurred based upon the retrospective review conducted pursuant to Section VII, the University shall notify the funding agency promptly following completion of the retrospective review, and shall submit a mitigation report including a description of the impact of the bias on the Research project, the University's actions taken to eliminate or mitigate the effect of the bias, the extent of harm done, and an analysis of whether the Research project is salvageable.

For so long as a Research project is ongoing, the University shall update its FCOI Reports with respect to the project on an annual basis, in the time and manner specified by the funding agency, to address the status of the reported Financial Conflict(s) of Interest and to disclose any changes to the management plan implemented by the University.

Details of each existing Financial Conflict of Interest of Senior/Key Personnel shall be made available to the public by posting on a publicly accessible Web site or provided on a per-request basis to requestors within five business days. Information made available pursuant to the preceding sentence shall include, at a minimum: the Investigator's name; the Investigator's title and role with respect to the Research project; the name of the entity in or with which the Investigator has the Significant Financial Interest constituting a Financial Conflict of Interest; the nature of the Significant Financial Interest; and the approximate dollar value of the Significant Financial Interest (if readily determinable). For purposes of the preceding sentence, "Senior/Key Personnel" include the project director or principal Investigator, and any other person identified as senior/key personnel by the University in the application, progress report, or any other report submitted to the funding agency.

IX. Investigator Training

Prior to beginning work on a Research project subject to this Policy, an Investigator will complete training with respect to this Policy within agency

Financial Interests, and applicable federal regulatory requirements, and inform the URO of the date the training was completed. Training must be updated at least every 4 years and if any of the following occurs:

- The University revises this Policy in a manner that affects Investigator obligations; or
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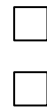
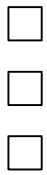
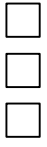
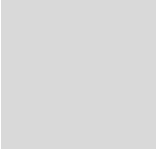
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PROPOSAL CLEARANCE FORM

ASSOCIATE PROVOST FOR RESEARCH: DR. AVROM CARL AN
PHONE: (212) 346-1092 EMAIL: [REDACTED]

PRINCIPAL INVESTIGATOR (PI), CO-PI, or SR. KEY PERSONNEL

PI NAME	DEPARTMENT	SCHOOL	PHONE/CELL	EMAIL
		Select School		
CO-PI or SR. KEY PERSONNEL NAME(S)	DEPARTMENT	SCHOOL	PHONE/CELL	EMAIL
1.		Select School		



SIGNATURES

Please leave the signature fields empty. (All signatures will be obtained via Adobe Sign). Provide the name of your chair and dean in the appropriate name field below so that we may send this form out for signatures.

PRINCIPAL INVESTIGATOR, CO-PI and SR. KEY PERSONNEL CERTIFICATION

PI _____ Date _____

Co-PI/SR. KEY _____ Date _____

Co-PI/SR. KEY _____ Date _____

Co-PI/SR. KEY _____ Date _____

Principal Investigator, Co-PI and SR. Key Personnel

As Principal Investigator/Co-PI, I certify that the information provided in this form is accurate. I will 0 612 92 re WBT/F5 9.9

Exhibit I APPENDIX A

FOR PRINCIPAL INVESTIGATORS AND CO-INVESTIGATORS OF NSF, NIH & OTHER PHS

Income from service on advisory committees or

Appendix C (Exhibit II in Pace University Policy and Procedures on Financial Conflict of Interest)
FOR PRINCIPAL INVESTIGATORS AND CO-INVESTIGATORS OF NSF, NIH & OTHER PHS¹ PROPOSALS AND GRANTS AS
WELL AS PRINCIPAL INVESTIGATORS SUBMITTING TO THE IRB AND TO IRB MEMBERS THEMSELVES
DEFINITION OF SIGNIFICANT FINANCIAL INTEREST
EFFECTIVE AUGUST 16, 2023

PACE UNIVERSITY
Significant Financial Interest Disclosure Form

(To be used for initial and annual disclosures and also whenever a new Significant Financial Interest arises.)

1. NIH and NSF Externally Sponsored Projects. **YES**

Financial Conflict of Interest Disclosure Details:

Signature _____

Printed Name _____

Date _____

Interim University Director for Sponsored Research Signature _____

Date _____