

**THE TEXAS A&M UNIVERSITY SYSTEM  
HEALTH SCIENCE CENTER RULE**

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**15.01.03.Z1 Conflicts of Interest in the Design, Conduct and Reporting of Sponsored Research**

Approved September 9, 2006

Supplements System Policy 15.01 and Regulation 15.01.03

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**1. DISCLOSURE OF FINANCIAL INTERESTS**

All investigators applying for research and/or educational grants must complete a Significant Financial Interest Certification (Attachment A). If the investigator certifies that he or she may have a significant financial interest, then the investigator must also complete the Significant Financial Interest Disclosure form (Attachment B) with all supporting documentation. Specific definitions and guidelines regarding conflicts of interest can be found in System Regulation 15.01.03.

**2. REVIEW OF DISCLOSURE**

- 2.1 Upon notification of an approved award, the Office of the Vice President for Research will forward all pertinent information to the Dean/Director of the appropriate HSC component, who will conduct an initial review of all financial disclosures.
- 2.2 If the initial determination is that there may be a potential conflict of interest, the investigator will be notified within seven days of the initial review and must disclose the required information about any entity that could be affected by the sponsored research or educational activities. This information will then be forwarded to the HSC Technology Commercialization Advisory Committee for review and recommendation.
- 2.3 The Technology Commercialization Advisory Committee will investigate cases involving potential conflicts of interest, and will submit a written summary of findings to the Vice President for Research and Graduate Studies within a reasonable period after notification, usually 30 days.

**3. ENFORCEMENT**

- 3.1 Apparent violations of this rule and applicable System regulations shall be brought to the attention of the Vice President for Research and Graduate Studies for review and appropriate action.
- 3.2 The Vice President for Research and Graduate Studies will report repeated or intentional violations of this rule to the funding agency and to the HSC

Dean/Director. The Vice President for Research and Graduate Studies and Dean/Director may impose sanctions that may include, but are not limited to, a letter of reprimand and the removal of the investigator from an ongoing project.

- 3.3 Appeals of impending sanctions for investigators shall follow procedures outlined in HSC Rule 32.01.01.Z1 *Complaint and Appeal Procedures for Faculty*, or HSC Rule 32.01.02.Z1 *Complaint and Appeal Procedures for Non-Faculty*. Appeals may also include a request for a hearing by the Committee on Academic Freedom, Responsibility and Tenure, as provided in System Policy 12.01.

## **OFFICE OF RESPONSIBILITY**

### **Vice President for Research and Graduate Studies**