

other ownership interests as determined through reference to public prices or other reasonable measures of fair market value;

- (ii) Non-publicly traded entities: a significant financial interest exists if the value of remuneration received from the entity in the twelve 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 (e.g., stock, stock option, or other ownership interest); or
- (iii) Intellectual property rights and interests (e.g., patents, copyrights), upon receipt of income related to such rights and interests; or
- (iv) Reimbursed or sponsored travel (i.e., paid on behalf of the Investigator) related to their University responsibilities. This does not apply to travel that is reimbursed or sponsored by a federal, state, or local government agency, or a U.S. institution of higher education.

Investigators also must disclose the occurrence of any reimbursed or sponsored travel (i.e., paid on behalf of the Investigator) related to their University responsibilities; however, this disclosure requirement does not apply to 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. This disclosure will include, at a minimum, the purpose of the trip, the identity of the sponsor/organizer, the destination, and the duration. The University official(s) will determine if further information is needed, including a determination or disclosure of monetary value, to determine whether the travel constitutes an FCOI with the PHS funded research.

The term _____ does not include the following types of financial interests: salary, royalties, or other remuneration paid by UNLV to the Investigator if the Investigator is currently employed or otherwise appointed by UNLV, including intellectual property rights assigned to UNLV and agreements to share in royalties related to such rights; income from investment vehicles, su

effect on August 2, 2011 (42 CFR Part 50 subpart Promoting Objectivity in Research). Changes to the Public Health Services conflict of interest policy included:

1. Lower financial disclosure threshold (from \$10,000 to \$5,000).
2. Disclosure of additional information (details about financial interests; the aggregate amount of compensation received from each entity; increased transparency for travel reimbursement). New financial interests must be disclosed within 30 calendar days of obtaining the financial interest.
3. Institutional responsibility for determining if the Significant Financial Interest (SFI) is related to the PHS-funded research, and if so, whether the SFI is a Financial Conflict of Interest (FCOI).
4. New public accessibility requirements regarding Investigators' Conflicts of Interest. FCOI are now posted on university's websites and include the Investigator's name, project, amount of the SFI, and the name of the entity where the financial interest is held.

The Outside Activity Request Form is completed by University employees _____ beginning any compensated outside service, unless it falls under the [Guidelines for Pre-Approved Activities List](#)

An SFI is related to funded research when the COIC reasonably determines that the SFI could be affected by the funded research, or if the SFI is in an entity whose financial interests could be affected by the research.

The following issues should be considered when determining the level of conflict and the value of the research project. This list is not intended to be inclusive

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- Ownership interest in sponsor or outside entity is not significant
- Consulting is **within guidelines for outside activities**
- Consulting is in an area separate from the research project
- Personal consulting agreement terms do not interfere with University obligations
- The Investigator does not stand to benefit financially from the **conduct or outcome of this project**

No product or testing of a product is involved in the project

- Project appears to support research leading to the advancement of knowledge
- Project provides appropriate research activity for **students or post} Á o P**

- Results will be shared openly with independent researchers and published in peer-reviewed journals

As is currently the policy, University resources, supplies, equipment, services, and facilities, as well as staff time, must not be used for the benefit of private interests without proper compensation to the University.

Proposed budget includes appropriate reimbursement of University costs

- Any proposed University cost sharing is consistent with policy and does not favor the sponsor or any outside entity

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- Proposed mechanisms of technology transfer of inventions and copyrights are appropriate
 - There is no conflict between University patent and copyright policy and the terms of any consulting or other agreement with the sponsor or outside entity

During the review, the COIC may find it necessary to obtain additional information from the Investigator. Some questions that might be considered when appropriate are:

1. Do the facts and circumstances suggest that the Investigator's financial involvement with the entity will in any way affect or impair the conduct of the research in accordance with the applicable policies and the highest professional standards?
2. How will the interests of the University be maintained in consideration of the Investigator's interest in the entity?
3. Will the research project lead to the advancement of knowledge rather than to routine testing of primary benefit to the entity?
4. How will this research project contribute to the University's mission of teaching, research, and public service?
5. Do the potential public benefits to be gained from undertaking this research outweigh any potential erosion of academic freedom, collegiality, or public trust?

In the event of a determination of a COI, the COIC will make recommendations for a management plan, which is a course of action to manage, mitigate, or eliminate the conflict of interest.

Management or elimination of conflicts of interest may include but not be limited to:

Withdrawal of proposal

- Non-acceptance of the gift or grant
- Notice to students and project personnel of the Investigator's conflicting interests
- Appointment of additional, non-conflicted student advisors
- Public disclosure of the related financial interest

- Monitoring of the project by independent reviewers
- Modification of the research or project plan
- Disqualification from participation in all or a portion of the project
- Divestiture of the related **financial interest(s)**
- Severance of relationships that create actual or potential conflicts

For federally funded investigators, the management plan at a minimum will describe the role and principal duties of the conflicted Investigator in the research project; the conditions of the management plan; how the management plan is designed to safeguard objectivity in the research project; conf icipation in ject