



Policy 1012

(Supersedes Policy 1003)

Conflict of Interest – Grants and Contracts

Responsible Office	Finance and Accounting	Effective Date	05/06/10
Responsible Official	Chief Financial Officer	Last Revision	10/16/12
			06/30/18

Principle

BW (Bloodworks Northwest) and Federal regulations require that investigators disclose any financial interest or outside time and/or commitment interest situations that may present an actual or potential conflict of interest in relationship to all grants and contracts. Such disclosures must be made prior to the submission of any proposal. BW has organization policies which address conflicts of interest, confidentiality and inventions.

Purpose

This policy seeks to ensure there are no conflicts of interest by an employee, officer, or agent of BW regarding federally funded programs or activities.

Scope and Responsibilities

This document applies to all federally sponsored awards made to BW by a Federal awarding agency or pass-through entity.

Definitions

Investigator: BW personnel who are the principal investigator/project director, co-principal investigator, including post-doctoral fellows, residents and students or any other person at the BW who is responsible for the design, conduct, or reporting of research, educational, or service activities.

Financial Interests: This applies to anything of monetary value, including, but not limited to,

- External salary or other payments for services (e.g. consulting fees or honoraria);
- Equity interests (e.g. stocks, stock options or other ownership interest);
- Intellectual property rights (e.g. patents, copyrights and royalties from such rights) held by an investigator, his or her immediate family or partner.
- Reimbursed or Sponsored travel related to institutional responsibilities, except if funded by any U.S. government agency or institution of higher learning, including academic hospitals; a gift (e.g., money, hospitality, or a physical item over \$100

"Exempt Interests" are defined in PROCEDURE 1012 Conflict of Interest – Grants and Contracts.

Public Health Service (PHS) Awarding Component: PHS is the umbrella organization in the U.S. Federal Government which consists of eight HHS health agencies, the Office of Public Health and Science, and the Commissioned Corps (a uniformed service of more than 6,000 health professionals). The National Institute of Health (NIH) is the largest Agency within the PHS and is most likely the agency that would be awarding research funds to BW.

Research: A systematic, intensive study intended to increase knowledge or understanding of the subject studied, a systematic study specifically directed toward applying new knowledge to meet a recognized need, or a systematic application of knowledge to the production of useful materials, devices, and systems or methods, including design, development, and improvement of prototypes and new processes to meet specific requirements. Research may also be termed "research and development."

Policy Statement

- BW will inform each Investigator of the institutional policy regarding conflict of interest and this specific POLICY 1012 Conflict of Interest – Grants and Contracts, including the Investigator’s disclosure reporting obligations and time frames for doing so.
- Reimbursed or sponsored travel undertaken by the Investigator and related to his/her institutional responsibilities must be disclosed, except if funded by BW, by U.S. Federal, state or local governmental agencies, U.S. institutions of higher education, research institutes affiliated with institutions of higher education, academic teaching hospitals, and medical centers.
- BW’s institutional officials, who will coordinate the determination of the existence of conflicting interests and action to assure that any conflicts will be managed, reduced or eliminated, are the Chief Scientific Officer, Chief Operating Officer, and the Administrative Director for Research.
- Records of the conflict of interest will be retained for at least three years from the date of submission of the final expenditures report or other dates as specified in POLICY 3033 Record Retention & Access.
- The guidelines the designated official(s) will follow in identifying and addressing a conflict of interest are defined in: *PROCEDURE 1012 Conflict of Interest – Grants and Contracts*.
- Any identified non-compliance will be reported to the Federal sponsor, as outlined in *PROCEDURE 1012 Conflict of Interest – Grants and Contracts*.
- Any conflicting interests not identified or managed will be disclosed in each public presentation of the results of the research.
- Conflict of Interest training will be provided to all individuals affiliated with BW immediately upon policy revision, and on hire. Investigators are required to complete Conflict of Interest training prior to engaging in research related to any Public Health Service funded grant and at least every four years. Investigators are also required to complete Conflict of Interest training immediately whenever BW’s Conflict of Interest policy is revised regarding investigator requirements, and whenever the individual is found to be in non-compliance with this policy or management plan. BW will provide training through regularly scheduled orientation training sessions, and/or internet based training modules. Through a partnership with the University of Washington, all investigators or designees will receive training through their Conflict of Interest module.
- BW will take reasonable steps to ensure that a sub-recipient will comply with Conflict of Interest regulations, requiring that the sub-recipient provide assurances that it has a written and enforced administrative policy and procedure to eliminate conflicting financial interests and will provide a copy of their own Conflict of Interest policy consistent with 2 CFR 200.112 Conflict of Interest, within thirty days of a request by BW. The sub-recipient is also required to immediately inform BW of any funds expended under the sub-award if it should identify a conflict of interest during the award period. If the Sub-recipient does not have an active and/or enforced conflict of interest policy they must agree to abide by the BW Conflict of Interest policy and related procedures.

References

- ❖ *CFR 200.112 Conflict of Interest*
- ❖ *POLICY 3033 Record Retention & Access*
- ❖ *PROCEDURE 1012 Conflict of Interest Grants & Contracts*
- ❖ *FORM 1012.1 Statement of Interest*
- ❖ *FORM 1012.2 Potential Conflict of Interest Disclosure*
- ❖ *Bloodwork’s Confidential Information and Inventions Policy POL ORG 0047 r00*