

PENSACOLA STATE COLLEGE
MANUAL OF PROCEDURES

Procedure Title:	Conflict of Interest Procedure for Grant Awards	<u>Number</u> 549
Related Policy:	Grant Administration – 6Hx20-5.015	<u>Page</u> Page 1 of 3

I. Purpose

To establish conflict of interest procedures for all grant awards.

II. Procedure

A. Definitions

1. "Grant personnel" refers to all employees, regardless of their title or position, who are responsible for the design, conduct, or reporting under the terms of a grant or contract, or the subaward of a grant or contract. All grant personnel are required to disclose any "Significant Financial Interests" (SFI) or those of their spouses, partners, or dependent children. This disclosure will be accomplished by completing the disclosure form. Having SFI does not necessarily entail a "Financial Conflict of Interest" (FCOI). A potential FCOI exists when the Vice President, Business Affairs reasonably determines that a SFI could directly or indirectly affect the design, conduct, or reporting of federally-funded research, teaching, or mentoring.
2. SFI is anything on monetary value, including but not limited to:
 - a. Remuneration for services exceeding \$5,000 in twelve months prior to the disclosure.
 - b. Equity interest (e.g., stock, stock options, other ownership instruments) exceeding \$5,000 in twelve months prior to disclosure.
 - c. Gains from intellectual property rights (e.g., patents, copyrights, royalties).
 - d. Travel reimbursed by other than a government agency, college, or university.
3. SFI does not include:
 - a. Remuneration from Pensacola State College.
 - b. Income from investment instruments in which the grant personnel does not control investment decisions.
 - c. Income from speaking or teach engagements sponsored by a government agency, college, or university.
 - d. Income from service on a review panel or advisory committee affiliated with any government agency, college, or university.

B. Timing of disclosures


1. Grant personnel must provide the required significant financial interest disclosures by completing the financial disclosure form immediately prior to the submission of a grant proposal. Grant personnel must update financial disclosures within thirty (30) days of acquiring or discovering any new significant financial interest. Grant personnel must annually update their financial disclosure forms within the period of the grant, beginning with the anniversary date of the original disclosure.
 2. Grant personnel return completed and signed financial disclosure forms to the Assistant Comptroller, Restricted Accounting or the Grant Accountant.
- C. Process of financial disclosure - grant personnel obligations
1. The Assistant Comptroller, Restricted Accounting, or the Grant Accountant will review each financial disclosure form and alert the Vice President, Business Affairs of any potential significant financial interests disclosed by grant personnel that might indicate any actual or perceived financial conflict of interest. If there are not any SFI relevant to the grant or contract, the Assistant Comptroller, Restricted Accounting, will sign off on the form and file it in the related grant or contract file. The Assistant Comptroller, Restricted Accounting, will review any potential conflict of interest and work with the Dean of Institutional Effectiveness and Grants, grant personnel, and the Vice President, Business Affairs to eliminate, manage, or reduce the conflict.
 2. Should the Vice President, Business Affairs, Assistant Comptroller, Restricted Accounting, or the Grant Accountant determine retrospectively that a FCOI was not identified or managed in a timely manner, a retrospective review of the grant staff member's activities on a grant project will be examined to determine whether the activities conducted during the period of non-compliance was biased in its design, conduct, or reporting. The Assistant Comptroller, Restricted Accounting, or the Grant Accountant will update any previously submitted report to the funding agency specifying the actions that will be taken to manage the FCOI going forward. If bias by any grant manager or staff member is found, the report will include a mitigation report in accordance with the applicable regulation, including a description of the impact of the bias on the grant project and the plan of action to eliminate or mitigate the effect of the bias.
 3. Except to the extent required by law and federal regulation, the information disclosed throughout these processes will be kept confidential. The College, however, is required to report the existence of real or potential conflicts of interest to certain federal agencies.
- D. Reporting financial conflicts of interest
1. SFI determined to be FCOI by the Vice President, Business Affairs, will be reported to the sponsoring agency with 60 days of their disclosure.
 2. The College shall maintain a record of all financial disclosures and all actions taken to resolve conflicts of interest for at least three (3) years beyond the termination or completion of the grant to which they relate.

E. Training

All grant personnel should be familiar with this procedure and understand it. Questions on what it means or if a situation is a conflict of interest should be addressed to the Assistant Comptroller, Restricted Accounting, or the Grant Accountant.

F. Subrecipients

Pensacola State College is responsible for ensuring that all subrecipients are compliant with federal regulations regarding financial conflict of interest. The College shall enter into written agreements with subrecipients that shall specify that there is no known financial conflict between the entity and the grant project. Individuals working on grant objectives must complete PSC's Conflict of Interest Disclosure Form.

Responsible Official: Vice President, Business Affairs
President's Signature:  Date: 02/21/2017