



CONFLICT OF INTEREST POLICY ASSURANCE OF COMPLIANCE FORM

Effective Date: January 1, 1997

Part I. Assurance Statement

Gustavus Adolphus College ("the College") has documented its conflict of interest policies regarding NSF- and PHS-sponsored projects in the document entitled Investigator Financial Disclosure/ Conflict of Interest Policy. All faculty seeking NSF and/or PHS support for research or educational activities (NSF only) are required to assure their compliance with these policies by answering the questions in Part II of this form and signing and returning the appropriate section of Part III to the Office of Corporate and Foundation Relations ("CFR") at least 10 working days prior to the proposal submission deadline.

If you have any questions about this document or are unclear how to respond, please discuss your concerns/questions with Bob Weisenfeld, Assistant Vice President for Corporate and Foundation Relations, Ext. 7049, or e-mail at bweis@gustavus.edu.

Part II. Questions

1. Do you have a Significant Financial Interest in a commercial organization that is directly related to your research interest (or would be affected by your research) or directly relates to a business decision you are participating in involving College funds? For this purpose "Significant Financial Interest" means an interest that annually exceeds \$10,000 in value (such as salary, consulting fees, honoraria, fees for seminars, lectures, or teaching engagements, royalties or intellectual property rights) or an ownership interest or stock option in the firm that exceeds 5% or \$10,000 when aggregated with the interests of your spouse and dependent children.

Yes _____ No _____ (If the answer to 1. is "yes," complete Appendix I)
2. Do you use or propose to use College facilities or personnel to conduct research or testing for any outside interests (excluding College-administered sponsored projects)?

Yes _____ No _____ (If the answer to 2. is "yes," complete Appendix I)
3. Do you consult with, or have a financial interest in, any commercial funding source that also sponsors clinical trials conducted by the College in which you simultaneously are responsible for the design, conduct or reporting of the College project?

Yes _____ No _____ (If the answer to 3. is "yes," complete Appendix I)
4. Do you supervise any students in any research effort that is directly related to outside financial interests (e.g. external consulting, intellectual property development, equity or stock options, or sponsored project that you are doing for a commercial purpose)?

Yes _____ No _____ (If the answer to 4. is “yes,” complete Appendix I)

IF YOU INTEND TO SERVE AS PRINCIPAL INVESTIGATOR (PI) OR CO-PI OR WILL BE RESPONSIBLE FOR THE DESIGN, CONDUCT OR REPORTING OF ANY PHS- OR NSF-SPONSORED PROJECT ADMINISTERED BY THE COLLEGE, ANSWER THE FOLLOWING QUESTIONS. OTHERWISE SKIP TO PART III.

5. Do you spend significant effort on external professional or commercial activities (e.g. external consulting) during periods of College employment?

Yes _____ No _____ (If the answer to 5. is “yes,” complete Appendix I)

6. Do you have some involvement or financial interest that is, or could be perceived to be, in conflict with the discharge of your duties at the College?

Yes _____ No _____ (If the answer to 6. is “yes,” complete Appendix I)

7. Are there any non-faculty staff, including students and technicians, on your project who are responsible for the design, conduct, or reporting of research activities? If so, these individuals will be required to assure compliance with the College’s Investigator Financial Disclosure/ Conflict of Interest Policy.

Yes _____ No _____ (If the answer to 7. is “yes,” complete Appendix I)

IF YOU INTEND TO SERVE AS PRINCIPAL INVESTIGATOR (PI) OR CO-PI OR WILL BE RESPONSIBLE FOR THE DESIGN, CONDUCT OR REPORTING OF ANY PHS- OR NSF-SPONSORED PROJECT ADMINISTERED BY THE COLLEGE INVOLVING COLLABORATING INSTITUTIONS, CONSULTANTS, AND/OR SUBCONTRACTORS, ANSWER THE FOLLOWING QUESTIONS. OTHERWISE SKIP TO PART III.

8. Does the sponsored project involve collaborating institutions? If so, individuals who qualify as investigators pursuant to Gustavus policy will be required to assure compliance with the College’s Investigator Financial Disclosure/Conflict of Interest Policy. If the answer to 8. is “yes,” complete Appendix I by listing the name and address of each collaborating investigator and by appending his or her Assurance of Compliance Form or his or her certification of compliance with the policies of his or her institution.

Yes _____ No _____ (If the answer to 8. is “yes,” complete Appendix I)

9. Does the sponsored project involve consultants and/or subcontractors? If so, these persons must assure compliance with the College’s Investigator Financial Disclosure/Conflict of Interest Policy. If the answer to 9. is “yes,” complete Appendix I by listing the name and address of each consultant and/or subcontractor and by appending his or her Assurance of Compliance Form.

Yes _____ No _____ (If the answer to 9. is “yes,” complete Appendix I)

Part III. Assurance Options

1. If you answered “No” to all of the questions in Part II, sign and return this form to the Office of Corporate and Foundation Relations at least 10 working days prior to the grant proposal submission deadline.

I hereby certify that I have read the Investigator Financial Disclosure/Conflict of Interest Policy and that my response to the questions in Part II is true to the best of my knowledge. I further represent that if my response to any of the questions in Part II changes during the next twelve months, I will submit a revised Conflict of Interest Policy Assurance of Compliance Form and will submit Appendix I. I supply this response for confidential review by the College, and I do not authorize release of any of it for any other use.

Signature

Printed Name

Date

Grant Program

2. If you answered “Yes” to one or more questions in Part II, complete Appendix I, sign below, and return this document to the Office of Corporate and Foundation Relations at least 10 working days prior to the grant proposal submission deadline.

I hereby certify that I have read the Investigator Financial Disclosure/Conflict of Interest Policy and that my response to the questions in Part II and the information provided in Appendix I are true to the best of my knowledge. I further represent that if my response to any of the questions in Part II changes during the next twelve months, I will submit a revised Conflict of Interest Policy Assurance of Compliance Form, including Appendix I. I supply this response for confidential review by the College, and I do not authorize release of any of it for any other use.

Signature

Printed Name

Date

Grant Program

APPENDIX I

For any questions that have been answered as “yes” in Part II, please list and give a written explanation below.

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