



Broward
Community
College

Policy Manual

Title: Financial Conflicts of Interest in Federally Sponsored Grant Projects	Number: 6Hx2-6.31
Legal Authority: Fla. Statutes 240.319 (2)	Page: 1 of 1

All colleges seeking or receiving funding from the National Science Foundation (NSF) or the United States Department of Health and Human Services (HHS) must have a written policy to avoid conflict of interest. Project directors and subcontractors with significant financial interests in organizations that might be affected by project research or activities are required to disclose such interest to Broward Community College through a Financial Disclosure Form. Project directors include the principal investigator, co-principal investigator, and any other person who is responsible for the design, conduct, or reporting of a research project funded or proposed for funding by the NSF or HHS. Also included are the project director's spouse and dependent children. Significant financial interests means anything of monetary value, including, but not limited to, salary or other payments for services (e.g., consulting fees or honoraria), equity interests (e.g., stocks, stock options, or other ownership interest), and intellectual property rights (e.g., patents, copyrights, and royalties from such rights).

The College reviews these disclosures and determines whether a significant financial conflict of interest exists. If so, prior to any expenditure of awarded funds, the College must report any conflicts to the funding source and act to protect the project from bias due to the conflict of interest. Actions may include (1) public disclosure of significant financial interests, (2) monitoring of research of project activities by independent reviewers, (3) modification of the research or activity plan, (4) disqualification from participation in all or a portion of the funded research or activities, (5) divestiture of significant financial interests, or (6) severance of relationships that create actual or potential conflicts. Disclosure information needs to be updated either annually or as project personnel acquire new significant financial interests.

[Link to Procedure A6H2x6.31](#)

History: Issued as Policy 6.63 on May 15, 1996; revised and re-numbered on June 18, 1997

Approved by the Board of Trustees	Date 06/18/97	President's Signature 	Date 06/18/97
--	-------------------------	--	-------------------------