

Policy Consultation and Approval Process

Summary of Comments Received during the Informal Review Phase

Conflict of Financial Interest with Grants and Sponsored Programs

A. Individual Comments

- As a faculty, I spend a considerable amount of time and effort to write a large grant. But once the grantor funds the project as a gift, the College Dean then takes over (owns) the fund and manages the fund to his liking without any accountability to the proposed original project. I lose control of the project, including the management of the project, and most importantly the ability to derive any financial payoff from my work. This is a highly unethical structure, perhaps an illegal arrangement as well. The incentives are not aligned correctly. There must be a Conflict-of-Interest Statement for Gifts as well grants, where the Deans sign to honor the writers or faculty who wrote the grant proposals, and the project itself. The Deans serve as the gatekeeper i.e. the reporting agent, not the owner of the funds. The Deans who did not write the grant cannot "steal" the funds from the grants. **Although the policy does not have the scope to address this specific situation (i.e. management, aka "ownership", of the awarded funds), the drafter recommends this comment be shared with the Custodian of the Policy, the Provost and Vice President for Academic Affairs, for further guidance on addressing these concerns, along with the Vice President for University Advancement with regards to mentioned gifts.**
- Pronouns listed should include they **CORRECTED**; consistently list PI/PD (they are reversed in some places) **CORRECTED**; the bullet item "Per title 42 code..." should be a statement and not part of the bulleted list **CORRECTED**; define NSF, NIH, and PHS prior to first use **CORRECTED**; spouses should be changed to partners **Refers to the legal definition rather than a committed relationship – follows the NSF and PHS federal policy with regards to who and when to report as a FCOI.**

B. Group Comments (Note: some comments may also have been submitted as individual comments above)