



<b>Policy TITLE:</b>	<b>Accounting Policies and Procedures for Administration of Assistance Agreements: Conflicts of Interest</b>
<b>Policy NO.:</b>	<b>1-120</b>
<b>REVISION NO:</b>	<b>1.2</b>
<b>Program</b>	<b>Administration and Support</b>

<b>Committee Approved Date:</b>	NA
<b>Policy Committee Reviewed Date:</b>	7/30/2012
<b>TNI Board of Directors Endorsed Date:</b>	NA
<b>POL Effective Date:</b>	7/30/2012

## I. OVERVIEW

Each Project Leader (PL) and any other TNI employee engaged in procurement actions is required to disclose to the Executive Director all significant financial interests, including those of the PL's spouse or domestic partner and dependent children, that would reasonably appear to be affected by activities funded or supported by the sponsor or in entities whose financial interests would reasonably appear to be affected by such activities. Such disclosure shall be in the form of a letter to the Executive Director.

The financial disclosure is required at the time a proposal is submitted, and such disclosures will be updated through the term of the award either through annual reporting or as an interest arises.

The disclosures will be reviewed by the Executive Committee of the Board of Directors of TNI. The Executive Committee will determine whether a conflict of interest exists, and determine what conditions or restrictions should be imposed if any to manage, reduce or eliminate the conflict. A conflict can be said to exist when the review reasonably determines that a significant financial interest could directly and significantly affect the design conduct or reporting of the funded research or educational support activities.

PL means principal investigator, co-principal investigators, or any other person who is responsible for the design, conduct, or reporting the proposed research or support.

The term "significant financial interest" means anything of monetary value, including salary or other payments for services (e.g., consulting fees or honoraria), equity interest, intellectual property rights (e.g., patents, copyrights, and royalties from such rights), which when aggregated for the PL, PL's spouse, or domestic partner and dependent children, which exceeds \$10,000 in value or represents more than 5% ownership interest in any single entity, OR is salary, royalties or other payments which when aggregated for the investigator, spouse or domestic partner, dependent children, exceeds \$10,000 annually.

The term “significant financial interest” does not include salary, royalties, or other remuneration from TNI, income from seminars, lectures, or activities sponsored by public or non-profit entities, income from service on advisory committees or review panels for public or nonprofit entities.

**Additional Related Policies:**

TNI Accounting Policies and Procedures for Administration of Assistance: Procurement Policy (Policy 1-113)

TNI Accounting Policies and Procedures for Administration of Assistance: Property Management and Control Policy (Policy 1-117)

TNI Accounting Policies and Procedures for Administration of Assistance: Reporting Policy (Policy 1-118)

TNI Accounting Policies and Procedures for Administration of Assistance: Policy on Recording Direct Labor Charges (Policy 1-119)

TNI Accounting Policies and Procedures for Administration of Assistance: General (Policy 1-111)

**Policy Approved Changes**

Revision No.	Effective Date	Description of Change
1.1	3-10-12	Larger policy split into individual policies. Updated format.
1.2	7-30-12	Change “SOP” to “Policy” in Related Policies