

Carnegie Mellon University
Financial Conflicts of Interest in Research Compliance

Quick Reference			
	Sponsored Research	SEI Staff	NREC Staff
Who must certify and disclose?	Investigators on all proposals listed in the SPARCS proposal system.	All SEI staff unless exempted by the SEI Ethics and Compliance office	All NREC staff unless exempted by NREC
Who is an Investigator?	The Project Director, Principal Investigator or any other person, regardless of title or position, who is responsible for design, conduct or reporting of research funded or proposed for funding. This includes all personnel identified by name in the grant application, progress report or other report submitted to the funding agency by the Institution.	N/A	N/A
What must be disclosed? See the CMU Guidelines for details.	<ul style="list-style-type: none"> ▪ <u>Significant Financial Interests</u> related to your Institutional Responsibilities. \$5,000 threshold plus any equity in a private entity. ▪ Sponsored and reimbursed travel above \$5,000 per organization. 	\$15,000 threshold; see the SEI COI Policy for details	See "Sponsored Research" column.
When is a Certification required?	<ul style="list-style-type: none"> ▪ Annually. ▪ As requested by ORIC ▪ Within 30 days of acquiring a new SFI 	<ul style="list-style-type: none"> ▪ When beginning work at the SEI ▪ Annually 	<ul style="list-style-type: none"> ▪ When beginning work at NREC ▪ Annually
How do I certify and disclose?	You will receive an e-mail with a link to begin your Certification. Log on to SPARCS (http://sparcs.cmu.edu) and follow the instructions. Contact ORIC if you have something to disclose but haven't received a Certification e-mail.	You will receive an e-mail with a link to begin your Certification. Log on to SPARCS (http://sparcs.cmu.edu) and follow the instructions.	You will receive an e-mail with a link to begin your Certification. Log on to SPARCS (http://sparcs.cmu.edu) and follow the instructions.
Who will see my information?	<ul style="list-style-type: none"> ▪ Staff in the Office of Research Integrity and Compliance (ORIC) will review Certifications. ▪ Certifications indicating a potential conflict of interest may be shared on an as-needed basis; see the CMU Guidelines for details. 	<ul style="list-style-type: none"> ▪ Staff in the SEI Ethics and Compliance Office as well as in ORIC may review disclosures. ▪ Any additional sharing of information will be subject to SEI's policy and processes; contact the SEI Ethics and Compliance office for details 	<ul style="list-style-type: none"> ▪ Staff in the Office of Research Integrity and Compliance (ORIC) will review Certifications. ▪ Certifications indicating a potential conflict of interest may be shared on an as-needed

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What if I have a conflict of interest?	<ul style="list-style-type: none"> Conflicts of interest must be managed, reduced or eliminated. Management plans are often used to manage the risk of bias in research and allow the research to be conducted. 	<ul style="list-style-type: none"> Conflict of interest review and management will be conducted by the SEI Ethics and Compliance Office; contact this office for detailed guidance. 	<ul style="list-style-type: none"> Conflicts of interest may be managed by NREC or ORIC depending on the circumstances.

*Faculty, staff, and students who are involved in research on campus as well as participating in SEI research as campus collaborators are required to comply with **both** the rules that apply to sponsored research funding **and** those applying to SEI staff, as long as the collaboration is ongoing.