Conflict of Interest FAQs

What Sponsored Travel must be reported?
All investigators must report the occurrence of any reimbursed or sponsored travel paid on behalf of the investigator that is related to their institutional responsibilities, regardless of the value. The monetary value does not need to be reported, however the purpose of the trip, sponsor, destination and duration of the trip must be disclosed. This may be disclosed prospectively for the year. For example: “Purpose: Board of Trustees meeting—Sponsor: American Heart Association—Destination: Texas—Duration: 4 trips in 2012 for 2 days each.” Travel sponsored or reimbursed by institutions of higher education, academic medical centers and research institutions affiliated with academic institutions does not need to be disclosed. Note: Travel reimbursed or sponsored by other non-profit organizations must be reported.

Does sponsored travel funded through foreign governments have to be reported?
Yes. United States government funded travel, including funding from state and local governments, does not have to be disclosed, but if foreign governments are providing the funding, it needs to be disclosed. Travel supported by institutions of higher education, academic medical centers and research institutions affiliated with academic institutions within the United States does not need to be disclosed.

Will OSP! submit a proposal if the disclosure of significant financial interest form has not been completed?
A proposal for funding from a PHS agency will NOT be submitted until disclosures have been received from each investigator. For non-PHS projects, a proposal will only be submitted prior to the receipt of all disclosure forms with permission from the Vice President for Research and Economic Development. The individual departments and colleges/deans should ensure that the disclosure forms are completed before the proposal submission reaches OSPA.(Office.of.Sponsored.Proposals.&.Awards).

Can someone e-mail the form on the investigator’s behalf?
No, the form must be from the individual’s email who is submitting the disclosure.

What about any updates or changes to information?
Those changes must come from the investigator directly and should be made within 30 days of the change.

How are research administrators tracking changes?
URSA will track disclosures and training centrally; however, at this time individual administrators do not have access to the URSA files. Investigators are strongly encouraged to copy any relevant administrators and the PI when emailing the completed disclosure form.
If no information has changed from an Investigator’s last submitted disclosure form, does the Investigator have to complete a new disclosure form to submit a proposal? What proposal information do they need to include?
In addition to providing an annual disclosure, Investigators must submit a Disclosure of Significant Financial Interest Form to sfidisclosure@gsu.edu for each proposal submission. Investigators are advised to save a copy of their most recent Disclosure of Significant Financial Interest Form and update the form as their outside financial interests change. Doing so will ensure that when the Investigator needs to submit a proposal, he or she will only have to update the form with the proposal-specific information.

What happens if an Investigator fails to submit an updated disclosure form within thirty days of a change (i.e. acquiring a new significant financial interest, discovering a previously undisclosed significant financial interest)?
Changes should be reported as soon as discovered (within 30 days). If changes are not reported within thirty days, GSU may be required to conduct a retrospective review depending on the funding agency (e.g. PHS agencies). If the review determines the research was biased by the failure to timely disclose, GSU may be required to notify the funding agency and provide a mitigation report. Additional action may be taken by the University and the funding agency.

How often is the spreadsheet showing completed disclosures and training up dated by URSA?
The spreadsheet will be updated daily during regular business operations.

How is the PI going to be held accountable?
Possible sanctions for violation of the Policy by an investigator include administrative intervention, withholding funding or preclusion from participation in government funded programs, or termination of employment.

Will resubmissions, non-competing continuation require the new forms?
The revised Policy applies to each grant or cooperative agreement with an issue date of the Notice of Award that is after July 24, 2012. For Notice of Awards dated after July 24, 2012, the new forms will be required and all investigators on the project will need to complete a Disclosure of Significant Financial Interest Form annually and prior to each sponsored proposal submission, and complete the CITI Conflict of Interest training prior to beginning a project. If the Notice of Award date is prior to July 24, 2012, new forms are not required.