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1. All General Conflicts of Interest, as described on the form.
  2. All Significant Financial Interests and those of their immediate family.
  3. All of their interests in or affiliation with any Financially Interested Entity, including those of their family members as defined in HR No. Policy 3.9 Employment of Relatives (Nepotism Rule).
  4. At a minimum, the Financial Conflict of Disclosure Form must be updated on an annual basis. The disclosure must also be updated within thirty (30) days as new reportable Significant Financial Interests or General Conflicts are obtained and/or identified. When sponsored program activity, regardless of the source of funding, is initiated, all principal researchers or key personnel (see ) on the proposal, contract, or agreement will be required to have an up-to-date Financial Conflict of Interest Disclosure Form for the current calendar year on file with the Office of Research and Sponsored Programs Administration (ORSPA) prior to submitting a proposal, signing a contract, or finalizing any agreement. When the proposal, contract, or other agreement is routed for approval, all Key Personnel on the project will also certify that they have an up-to-date



or unfunded research or sponsored programs activities. This also includes all significant relationships of the r

reporting of funded or unfunded research or other sponsored programs activities funded or proposed for funding by the federal government or other external funder.

**K.** . An individual responsible for interpreting and enforcing compliance across all research and sponsored programs enterprises across the University. This officer shall









