

Science Communication Lab

Financial Conflict of Interest Policy

Last Updated: July 27, 2021

BACKGROUND

A financial conflict of interest may exist when the personal or professional interests or concerns of a Board member, staff member, contractors and volunteers (“personnel”) are potentially in competition with the interests or concerns of SCL. SCL resolves conflicts in order to ensure that individuals are acting in the interests of the SCL and not for any personal or third-party gain, promotion of commercial interests, or financial enrichment. Such resolution may include withdrawing from certain discussions and decision-making, curtailing the employee’s responsibilities, asking the employee to rectify the conflict, or asking the employee to resign.

OBLIGATION TO DISCLOSE

An employee of the Corporation with a potential conflict of interest in a particular matter shall promptly and fully disclose the potential conflict to his/her supervisor. The employee shall thereafter refrain from participating in deliberations and discussion, as well as any decisions, relating to the matter and follow the direction of the supervisor as to how the Corporation decisions which are the subject of the conflict will be determined. The President shall be responsible for determining the proper way for the Corporation to handle Corporation decisions which involve unresolved employee conflicts of interest. In making such determinations, the President may consult with legal counsel.

DISCLOSURE FORM

The Secretary of the Corporation shall distribute annually to all Directors, officers and key employees (as identified by the Corporation), a form soliciting the disclosure of all conflicts of interest, including specific information concerning the terms of any contract or transaction with the Corporation and whether the process for approval set forth in this policy was used.

GIFTS

Except for gifts of a nominal value, not worth more than \$20, employees shall not accept gifts or other items of monetary value from any person or entity seeking official action from, doing business with, or conducting activities controlled by SCL, or whose interest may be substantially affected by the performance or nonperformance of the employee’s duties.

BOARD OF DIRECTORS

The SCL Board of Directors Conflict of Interest Policy is located within Section 7 of the SCL Bylaws and is also available as a [stand-alone document](#).

PUBLIC HEALTH SERVICES

In addition to the preceding policy, the following specific procedures shall be followed with regards to any funding requested or received by SCL from U.S. Public Health Services (PHS):

1. Prior to any SCL investigator applying for or initiating any PHS-funded work, the SCL Director shall require that investigator to complete and submit the [SCL Financial Disclosure Form](#). For the purpose of this policy, "investigator" means the principal investigator and any other person - including subrecipients, subgrantees, contractors, or collaborators - who is responsible for the design, conduct, or reporting of research funded by PHS, or proposed for such funding.
2. If PHS funding is awarded, the investigator must re-submit the form on an annual basis and/or as new reportable Significant Financial Interests are obtained.
3. Upon form submittal, the SCL Director will review the disclosure and determine whether a conflict of interest exists and, if so, determine what actions should be taken by SCL to manage, reduce or eliminate such conflict of interest. A conflict of interest exists when the Director reasonably determines that a Significant Financial Interest could directly and significantly affect the design, conduct, or reporting of the PHS-funded research. Examples of conditions or restrictions that might be imposed to manage conflicts of interest include, but are not limited to:
 - (1) Public disclosure of significant financial interests;
 - (2) Monitoring of research by independent reviewers;
 - (3) Modification of the research plan;
 - (4) Disqualification from participation in all or a portion of the research funded by the PHS;
 - (5) Divestiture of significant financial interests; or
 - (6) Severance of relationships that create actual or potential conflicts.
4. Prior to SCL's expenditure of any funds under a PHS award, SCL will report to the PHS Awarding Component (i.e. the organizational unit of the PHS that funds the research that is subject to this policy) the existence of a conflicting interest (but not the nature of the interest or other details) found by SCL and assure that the interest has been appropriately managed, reduced or eliminated; and, for any interest that SCL identifies as conflicting subsequent to the Institution's initial report under the award, the report will be made and the conflicting interest managed, reduced, or eliminated, at least on an interim basis, within sixty days of that identification.
5. SCL will inform each Investigator of SCL's policy on financial conflicts of interest, the Investigator's responsibilities regarding disclosure of significant financial interests, and of relevant controlling regulations, and require each Investigator to complete training regarding the same prior to engaging in research related to any PHS-funded contract and at least every four years, and immediately when any of the following circumstances apply:
 - (1) SCL revises its financial conflict of interest policies or procedures in any manner that affects the requirements of Investigators;
 - (2) An Investigator is new to SCL; or
 - (3) SCL finds that an Investigator is not in compliance with SCL's financial conflict of interest policy or management plan.

6. SCL will maintain records of all financial disclosures and all actions taken by SCL with respect to each conflicting interest for at least three years from the date of submission of the final expenditures report or, where applicable, from other dates specified in 45 CFR 74.53(b) for different situations.
7. SCL agrees to make information available, upon request, to the Department of Health and Human Services regarding all conflicting interests identified by SCL and how those interests have been managed, reduced, or eliminated to protect the research from bias.
8. Notwithstanding the above, SCL will otherwise take all actions necessary to maintain full compliance with PHS provisions of 42 CFR Part 50, Subpart F and 45 CFR Part 94. Wherever this policy exhibits any omission, conflict, or inconsistency with the aforementioned regulations, the aforementioned regulations take controlling precedence.
9. This policy document will remain publicly available at www.ibiology.org.