

Policy: Financial Conflicts of Interest Related to Research and Sponsored Programs

Public Comment Period: September 24, 2021 - October 24, 2021

Implementation: October 2021

Overview:

The policy establishes the disclosure requirements that apply to university personnel responsible for the design, conduct, reporting, or direct administration of University Research or Sponsored Programs. Lehigh University is responsible for identifying and managing any real or apparent financial conflicts of interest (fCOIs) related to research. An fCOI exists when the university reasonably determines, pursuant to its policy, that an individual's significant financial interest is related to their research, and could directly and significantly affect the design, conduct, or reporting of the research.

This is a revision to an existing policy that was originally effective January 1, 2020. The principles of financial conflicts of interest related to research and sponsored programs have not changed.

Who is impacted by this change:

Those primarily impacted include Lehigh personnel responsible for the design, conduct, reporting, or direct administration of University Research or Sponsored Programs. "University Research" refers to any research activity supported by university funds, regardless of source. "Sponsored Programs" refers to both programs funded by a sponsor through a grant, contract, or agreement with the university (including, but not limited to, research, education, testing, outreach, etc.), and to programs funded through Lehigh University's internal grant programs administered through the office of the Vice President and Associate Provost for Research and Graduate Studies (VPR).

Timing:

The revised policy will be effective following a 30 day public comment period, during which time the revisions will be posted to the Research Integrity website, campus communications will be issued, and comments may be submitted by email to incoi@lehigh.edu. The public comment period will end on October 24, 2021. The revised policy has been approved by the Conflict of Interest Review Committee (CIRC).

Summary of revisions:

- The timeline for receipt of income from IP rights and interests was expanded to include income anticipated in the twelve months following the disclosure, in addition to the existing timeline of twelve months prior to the disclosure. This is the standard that has been applied in practice and the policy is being revised to include it as a formal requirement.
- A timeline of twelve months preceding the disclosure and anticipated in the twelve months following the disclosure was added to the management position section of the definition of Significant Financial Interest.
- The definition of a Significant Financial Interest pertaining to travel reimbursement for PHS funded investigators was revised for clarity.
- Minor edits were made throughout the document, including to definitions of Significant Financial Interests, to apply consistent formatting, and for clarity.
- The definition of a Foreign Talent Recruitment program was revised to more closely correspond to the definition provided by the Joint Committee on the Research Environment (JCORE) of the National Science and Technology Council (NSTC), Subcommittee on Research Security's 2021 report, "[Recommended Practices for Strengthening the Security and Integrity of America's Science and Technology Research Enterprise](#)".