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Office of Research Compliance

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Financial Conflict of Interest (FCOI)

Federal regulations require institutions to have policies and procedures in place to ensure that investigators disclose any significant financial interest that may present a conflict of interest in relationship to externally sponsored projects. Such interests can threaten –or seem to threaten – the integrity of educational programs and research agendas, the free dissemination of scholarship, and the appropriate use of public resources for public benefit. Disclosures of this nature must be made prior to the submission of a proposal for funding and institutions must develop specific mechanisms by which conflicts of interest will be satisfactorily managed, reduced or eliminated prior to acceptance of an award.

Responsibilities of UMaine 'Investigators'

- Understand the University of Maine's Definitions, Policies and Procedures
- Prior to submitting a request for extramural funding, successfully complete the required FCOI training, and certify whether or not you have a significant financial interest related to the proposed activity.
- Any 'investigator' having such an interest must complete a *Significant Financial Interest Disclosure Form* and in certain circumstances follow an approved Conflict Resolution Plan.

Up Next: [Definitions](#)

Contact for FCOI Questions



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Definitions

A **Conflict of Interest (COI)** is a divergence between an individual's private interests and his or her professional obligations to the University such that an independent observer might reasonably question whether the individual's professional actions or decisions are determined by considerations of personal gain, financial or otherwise.

Investigator refers to the Project Director/Principal Investigator, any other person identified as Senior/Key personnel in a grant application, progress report, or other report submitted to an external sponsor, and others who direct or can materially influence the research, or who are responsible for the design, conduct, and reporting of such research.

Significant Financial Interest means anything of monetary value, including but not limited to salary or other payments for services (e.g., consulting fees or honoraria); equity interests (e.g., stocks, stock options, or ownership interests); and intellectual property rights (e.g., patents, copyrights, and royalties from such rights).

Up Next: [UMaine FCOI Policy & Procedures](#)



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Policy & Procedures

The University of Maine's [Policies and Procedures for Financial Disclosures and Conflicts of Interest in Extramurally Sponsored Activities \(PDF\)](#), applies to all University employees and students who serve as investigators on proposals submitted to external sponsors. The policy applies equally to UMaine investigators, and investigators at other University of Maine System (UMS) campuses ('UMS investigators') who wish to submit through, or collaborate with UMaine on an extramural funding request.

Procedures:

- Prior to submitting a request for extramural funding, each Investigator named in a proposal must successfully complete the Collaborative Institutional Training Initiative (CITI) FCOI training (see [Instructions for CITI Training \(PDF\)](#)) and certify whether s/he has a significant financial interest related to the proposed activity (This certification is generally completed in [PARS – Proposal Automated Routing System](#)).
- Any Investigator having such an interest must complete a [Significant Financial Interest Disclosure Form \(PDF\)](#).
- In the proposal text, or in an attachment to the proposal, the Investigator must describe their significant financial interest or potential conflict of interest (see [Example COI Narrative](#)).
- Steps to manage or eliminate conflicts of interest will be incorporated into a Conflict Resolution Plan approved by the Financial Disclosure Review Committee (FDRC). Each Investigator must certify that s/he will adhere to all terms and conditions of a Conflict Resolution Plan prior to the University's acceptance of an award.
- The investigator will be required to periodically reports/update information.

Note: Individuals not listed as investigators in proposals who later assume such roles through hiring, promotion, or other means are required to complete CITI FCOI training, complete and submit either a [PI Certification Statement \(PDF\)](#) or a [Co-PI Certification Statement \(PDF\)](#) and

make any applicable disclosures prior to commencing work on the project.



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UNIVERSITY OF MAINE

**Policies and Procedures for
Financial Disclosures and Conflicts of Interest
in Extramurally Sponsored Activities**

**Office of the Vice President for Research and Dean of the Graduate School
Office of Research Compliance**

Approved 8/1995

Last Updated 9/26/2019¹

¹ Previously Updated 8/2012, 3/2013, 10/22/2013, and 3/6/2018.

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**Policies and Procedures for
Financial Disclosures and Conflicts of Interest (COI)
in Extramurally Sponsored Activities**

Declaration of Policy

The University of Maine is committed to preserving and furthering ethical conduct, institutional integrity, and public confidence in research pursuits. University of Maine personnel engaged in extramurally funded work shall act at all times in a manner consistent with their public responsibilities to the University and shall exercise particular care that no detriment to the University results from conflicts between their personal financial interests and the interests of the University. Such interests can threaten – or seem to threaten – the integrity of educational programs and research agendas, the free dissemination of scholarship, and the appropriate use of public resources for public benefit. Accordingly, investigators shall disclose all significant financial interests they may have in extramurally funded work, and shall adhere to any conditions or restrictions imposed by the University to manage, eliminate, or reduce conflicts relating to those interests.

This policy outlines the obligations of University personnel to disclose significant financial interests and the responsibility of the University to review such information and take appropriate steps to manage, reduce, or eliminate related conflicts. Certain financial interests are inherent in the incentive structure of the academic enterprise. Such incentives are not inherently bad and are indeed motivating forces for diligence in research. It is not the intent of this policy to prohibit all extramurally sponsored activities in which investigators hold a more easily defined significant financial interest, however, it is required that these interests be disclosed and that the project be conducted in such a way that such interests do not compromise, or appear to compromise, an investigator's professional judgment in conducting projects or reporting results.

This policy complies with, and is guided by, the U.S. Department of Health and Human Services (USDHSS) Public Health Service (PHS) regulations (42 CFR Part 50 § F and 45 CFR Part 94.

Applicability

This policy applies to all University employees and students who serve as investigators in proposals submitted to external sponsors. Sub-awardees and their personnel, and collaborators of other institutions (collectively 'Sub-Awardees') must either comply with this policy or document that their institutions or organizations are in compliance with USDHHS PHS rules by certifying that: (a) their company or institution has a financial conflict of interest policy that is compliant with USDHHS PHS rules; and (b) they have received COI training; and (c) if necessary, they have made COI disclosures as required by their institution's or company's COI policy; or (d) **they cannot so certify and will be subject to the University of Maine's COI policy.**

Definitions

A ***Conflict of Interest*** is a divergence between an individual's private interests and his or her professional obligations to the University such that an independent observer might reasonably question whether the individual's professional actions or decisions are determined by considerations of personal gain, financial or otherwise.

Investigator refers to the Project Director/Principal Investigator, any other person identified as Senior/Key personnel in a grant application, progress report, or other report submitted to an external sponsor, and others who direct or can materially influence the research, or who are responsible for the design, conduct, and reporting of such research.

Significant Financial Interest means anything of monetary value, including but not limited to salary or other payments for services (e.g., consulting fees or honoraria); equity interests (e.g., stocks, stock options, or ownership interests); and intellectual property rights (e.g., patents, copyrights, and royalties from such rights).

Specifically ***excluded*** from the definition of Significant Financial Interest are:

- (1) Income from seminars, lectures, or teaching engagements sponsored by public or nonprofit entities.
- (2) Incomes from service on advisory committees or review panels for public or nonprofit entities.
- (3) Investments in mutual funds or retirement programs if the investigator has no practical control over the management of those investments.
- (4) Royalties paid by the University.

- (5) Regular salary, summer salary, or overload compensation paid by the University when the rate of compensation is set by the University. (Note: consulting fees or other forms of overload compensation paid by the University at rates other than that established by the University are not necessarily excluded from the definition of significant financial interest; see item 7 below.)
- (6) An equity interest that, when aggregated for the investigator and the investigator's spouse and dependent children satisfy both of the following conditions: (a) does not exceed \$5,000 in value as determined through reference to public prices or other measures of fair market value, and (b) does not represent more than a 5% ownership interest in any single entity.
- (7) Overload salary, consulting fees, royalties or other payments that, when aggregated for the investigator and the investigator's spouse and dependent children over the prior twelve months have not exceeded \$5,000 and over the next twelve months are not expected to exceed \$5,000.

Obligation to Disclose Financial Interests

By submitting a [*Significant Financial Interest Disclosure Form*](#), each University employee and student who serves as an investigator on proposals submitted to external sponsors must disclose for himself or herself, and for his or her spouse and dependent children –

- (a) all significant financial interests that would reasonably appear to be affected by the activities funded or proposed for funding, and
- (b) all significant financial interests in entities whose financial position would reasonably appear to be affected by activities funded or proposed for funding.

Regardless of the above minimum requirement, an investigator in his or her best interest may choose to disclose other financial or related interests that could present, or be perceived to present, a conflict of interest. Also, it is not possible to specify all the possible personal relationships or business arrangements which might result in significant financial interests for University personnel engaged in extramurally sponsored activities. In completing a Financial Disclosure Statement, however, University personnel are expected to follow the spirit of this Policy and disclose other financial interests that might be anticipated to threaten the same harm. For example, the financial interests of a parent, sibling, independent child, unmarried domestic partner, or a close associate may be perceived as grounds for the same kind of conflict of interest, and should be reported, if known. Similarly, the promise of future gifts, or

the offer of a loan on advantageous terms not available to the general public, might represent a disclosable significant financial interest.

Financial Conflict of Interest Training and Investigator Certification

Prior to submitting a proposal, each named Investigator must successfully complete UMaine's training on COI and submit an *Investigator Conflict of Interest Certification*, specifying whether s/he has any significant financial interest relating to the proposed activity. All other investigators will successfully complete UMaine's training on COI and submit an *Investigator Conflict of Interest Certification* before they may be supported with award dollars.

Financial Conflict of Interest Disclosure

Any investigator having a significant financial conflict of interest shall complete a [Significant Financial Interest Disclosure Form](#) and submit it with supporting documentation that specifies all business enterprises or entities involved and the nature and amount of each interest. All documentation must be submitted to the Office of Research Compliance; **this information must be received before a proposal will be submitted by the Office of Research Administration.**

At the investigator's option, the supporting documentation may also include a proposed Conflict of Interest Resolution Plan. The Office of Research Compliance will treat disclosures and supporting documents as confidential materials prepared for the Financial Disclosure Review Committee, however, please note that pursuant to PHS regulations, disclosure forms provided to the University in connection with PHS-funded projects must be made publicly available upon request.

In addition, each investigator disclosing a significant financial interest shall describe such interest in the proposal narrative or in an attachment thereto, to make certain that the potential sponsor will be fully aware of the possibility of a conflict of interest situation before a final decision on the potential award is made (see Appendix III).

Review of Disclosures

A standing Financial Disclosure Review Committee (FDRC) shall be responsible for (a) reviewing financial disclosures, (b) developing or approving plans to manage or eliminate conflicts of interest, and (c) advising the campus community about this policy. The Committee shall be comprised of the Vice President for Research and Dean of the Graduate School (Chair), the

Director of Research Administration, the Vice President for Innovation and Economic Development, the Director of Research Compliance (Secretary), and the Chair of the Research and Scholarship Committee of the Faculty Senate, and one tenured faculty member from each College, appointed by their respective Deans to be staggered for three-year terms.

The Vice President for Research and Dean of the Graduate School, in consultation with the Director of Research Administration and the Vice President for Innovation and Economic Development shall conduct an initial review of all financial disclosures to determine whether a conflict of interest exists. A conflict of interest exists if a reasonable determination can be made that a significant financial interest could directly and significantly affect the design, schedule, conduct, or reporting of the activities proposed for funding. If the initial determination is made that there is a conflict of interest covered by this policy, then the disclosure packet will be referred to a Subcommittee of the FDRC.

Prior to consideration by the Subcommittee of the FDRC, the investigator, in cooperation with the investigator's academic department or unit, shall develop and submit to the Director of Research Compliance a Conflict Resolution Plan that details proposed steps that will be taken to manage or eliminate any conflict of interest presented by the investigator's financial interests.

The Chair will appoint the Subcommittee of the FDRC to review and act on each Conflict Resolution Plan. Normally a Subcommittee will be comprised of eight members; five ex-officio members of the Committee (Vice President for Research and Dean of the Graduate School, the Director of Research Administration, the Vice President for Innovation and Economic Development, the Director of Research Compliance, and the Chair of the Research and Scholarship Committee of the Faculty Senate), plus three tenured faculty members appointed by the Chair. In the event members of the Subcommittee are unable to serve in a timely manner, or have a relationship to the individual making the disclosure that represents a potential conflict of interest, or if in the judgment of the Chair, other circumstances warrant restructuring the Subcommittee, the Chair may appoint an alternative Subcommittee of no fewer than five members to act on behalf of the FDRC.

The Subcommittee shall review the Conflict Resolution Plan and approve it, disapprove it, or require modifications, conditions, or restrictions. Such conditions or restrictions may include, without limitation: (a) public disclosure of significant financial interests; (b) monitoring of the funded activities by independent reviewers; (c) modification of the planned activities (which may be subject to sponsor approval); (d) disqualification from participation in all or a portion of the project; (e) divestiture of significant financial interests; (f) severance of relationships that

create conflicts; (g) appointment of an alternate PI; or (h) appointment of an individual to provide independent technical or financial oversight.

The Subcommittee may, at its discretion, invite individuals with special expertise, including legal counsel, to assist the members in reviewing and resolving complex issues. These individuals may not vote with the Subcommittee. A Subcommittee may also, at its discretion, invite the person whose disclosure statement is under review to attend meetings, participate in discussions, and/or provide supplementary clarifying information.

The Office of Research Compliance will be responsible for monitoring compliance with approved Conflict Resolution Plans. The Subcommittee shall specify the type and frequency of reporting required, but in no instance should reporting be less than once per year.

If the Subcommittee determines that imposing conditions or restrictions would be either ineffective or inequitable, and that the potential negative impacts that may arise from a significant financial interest are outweighed by interests of scientific progress, technology transfer, or the public health and welfare, the Subcommittee may allow the research to go forward without imposing conditions or restrictions.

Time Schedule

The Vice President for Research and Dean of the Graduate School shall normally decide within ten (10) days whether a potential conflict of interest exists. If so, the investigator will be asked to prepare a proposed Conflict Resolution Plan, and the Financial Disclosure Review Subcommittee shall normally act on that plan with thirty (30) days of its receipt. The Subcommittee may decide to extend the review period by up to an additional thirty (30) days when such a delay is warranted by the complexity of the circumstances.

Whereas investigators must disclose significant financial interests before a proposal is submitted to an external sponsor, the Conflict Resolution Plan, if any, does not need to be finalized until just prior to acceptance of the award. The time duration between the submission of a proposal and the offer of any award varies greatly from a few days, in some instances, to more than a year in others; and of course, not all proposals result in awards. In view of these circumstances, the principal investigator or project director may request that the review of all disclosures relating to the subject proposal be deferred until such time as an award is offered. In that event, the time schedule outlined above will still apply; only the starting point is delayed.

Reconsideration of Conflict Resolution Plans

Final responsibility for the review of financial disclosures and approval of a Conflict Resolution Plan is vested with the Financial Disclosure Review Subcommittee. In the event that the resolution plan specified by the Subcommittee is unacceptable to the investigator whose interests have been disclosed, he or she may request reconsideration, and may meet with the Subcommittee to explain why the plan is unacceptable and to propose changes. The request for reconsideration shall be in writing and shall be submitted to the Subcommittee via the Director of Research Compliance. Upon receipt of such a request, the Subcommittee shall have thirty (30) days in which to consider the changes proposed, or other modifications deemed appropriate, and to issue its final resolution plan.

There are no further provisions for reconsideration or appeal within this policy. If the Subcommittee's requirements remain unacceptable to the Principal Investigator or Project Director of a proposed project, the University shall decline the award. If the Subcommittee's requirements are unacceptable to another of the project's investigators, the University shall seek sponsor approval to replace that investigator.

Further Administrative Approval

Conflict Resolution Plans approved by a Financial Disclosure Review Subcommittee may be disapproved, or approved with additional terms and conditions by the Provost, President, or by any other University officer designated by the President. However, no officer of the University may approve a Conflict Resolution Plan which does not include as a minimum all terms and conditions approved by the Subcommittee.

Certification of Compliance

Each person judged to have a conflict of interest must sign an agreement certifying that he or she will adhere to all conditions or restrictions imposed by the Subcommittee and will cooperate fully with any individual(s) assigned responsibility for monitoring compliance. The University will not accept an award until the Director of Research Compliance has received signed Certifications of Compliance for all project personnel judged to have a conflict of interest.

Updating Financial Disclosures

All investigators are responsible for updating information on new reportable significant financial interests, such that accurate and current information is on file with the University at all times. New reportable significant financial interests include financial interests that become reportable due to an increase in value that meets the reporting threshold, as well as the acquisition of new interests that are reportable. Updated financial disclosures must be submitted to the Director of Research Compliance within fifteen (15) days of the reportability of such interests, either during the period of a funded project or during the period in which a decision on a proposal is pending.

When an updated Significant Financial Interest Disclosure Form is received during the period of an ongoing project, the Vice President for Research and Dean of the Graduate School, in consultation with the Director of Research Administration and the Vice President for Innovation and Economic Development, shall review the updated information within ten (10) days of its receipt and decide whether it causes a conflict not already satisfactorily managed, reduced, or eliminated under the current Conflict Resolution Plan. If it is decided that a new conflict is not already satisfactorily managed or eliminated under the current Conflict Resolution Plan, the investigator shall have ten (10) days to prepare and submit a new or revised Conflict Resolution Plan, and the Financial Disclosure Review Subcommittee shall have an additional thirty (30) days in which to act upon it. After receiving the determination of the Subcommittee, the person making the updated disclosure shall then have ten (10) days to: (a) sign a certification to abide by any new conditions or restrictions imposed by the Subcommittee, (b) seek reconsideration by the Subcommittee, or (c) terminate participation in the funded project.

If an updated disclosure statement is received by the University while a decision on a proposal is pending, the University shall defer acceptance of the related award until the Vice President for Research and Dean of the Graduate School, and if necessary, a Financial Disclosure Review Subcommittee has reviewed and acted on the updated information, and the investigator has certified compliance with any new terms and conditions.

Individuals not listed as investigators in proposals, but who later assume such roles through hiring, promotion or other means, shall complete training on COI and submit an *Investigator Financial Conflict of Interest Certification* before beginning work on the project as an investigator:

- (a) If the individual (including the individual's spouse and dependent children) has no significant financial interests related to the project, work may begin immediately upon submitting written certification of that fact.
- (b) If significant financial interests exist, the individual shall delay work on the project until a [Significant Financial Interest Disclosure Form](#) has been filed and acted upon, and he or she has certified compliance with the Conflict Resolution Plan, if any, as above.

Reporting

All investigators must submit a Financial Conflict of Interest (COI) Resolution Reporting Form for the project at least annually or more frequently if so required. While the Office of Research Compliance will send a notice to investigators, it is ultimately the investigator's responsibility to adhere to this requirement.

The Vice President for Research and Dean of the Graduate School will report the actions of the Financial Disclosure Review Committee to the Provost and President. The Director of Research Administration will also report the existence of conflicting interests, financial disclosures, and/or related Conflict Resolution Plans to the sponsor of the relevant project, if (a) such reporting is required by the pertinent program regulations or guidelines, (b) the University finds that it is unable to manage or eliminate a conflict of interest, or (c) the failure of an investigator to comply with this policy has biased the design, conduct, or reporting of the research. In the last case, report will also be made of corrective action taken or to be taken.

Record Keeping

The Office of Research Compliance shall be responsible for maintaining records related to all disclosures, associated reviews and actions (whether or not a disclosure resulted in a determination of a financial conflict of interest), reporting/updating information, etc. The records shall be maintained for a minimum of three (3) years after the date of the termination or completion of the corresponding funded project, or the resolution of any audit or legal action involving the records.

Enforcement

Whenever an investigator has violated this policy or the terms of an approved Conflict Resolution Plan, the FDRC shall recommend sanctions which may include disciplinary action ranging from a letter of reprimand to termination of employment. If the violation results in a

collateral proceeding under the [University's Policy and Procedures on Alleged Misconduct in Research and Other Scholarly Activities](#), the FDRC shall defer its recommendation until the collateral proceeding is completed. The FDRC shall present its recommended sanctions to the Provost and President who shall decide on specific sanctions and their implementation.

Instructions to Access CITI Training

Office of Research Compliance (ORC), University of Maine

The Office of Research Compliance (ORC) delivers a variety of research training through the University of Maine System (UMS) subscription service to the Collaborative Institutional Training Initiative (CITI). These instructions guide you through the institution-specific CITI registration and enrollment processes. Further information about Research Compliance at the University of Maine and training requirements can be found on the [ORC website](#).

IMPORTANT NOTE: You are only required to complete the training(s) for your specific area(s) of research compliance.

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I. Establish a CITI Account

- a. Please note: if you have previously set up a CITI account, please do NOT create another one. See Section II (Log into CITI as an Existing User) of this document for guidance.
- b. Go to [CITI Program \(https://about.citiprogram.org/\)](https://about.citiprogram.org/) and click on the white “Register” button located in the upper right hand corner of the homepage.



- c. Search for ‘University of Maine System’ in the section titled ‘Select your Organizational Affiliation’ and click on it.
 - i. Click the check boxes to agree to the CITI Terms of Service and Privacy Policy, and to agree that you are an affiliate of the University of Maine System.
 - ii. Click the “Continue to SSO Login/Instructions”
 - iii. Note: No action is needed in the bottom section titled “Independent Learner Registration.”

The screenshot shows the 'CITI - Learner Registration' page. At the top is the CITI PROGRAM logo and a language selector set to 'Eng'. Below the logo are three links: 'LOG IN', 'LOG IN THROUGH MY ORGANIZATION', and 'REGISTER' (which is underlined). The main content area is titled 'CITI - Learner Registration' and shows a progress bar with steps 1 through 7, where step 1 is highlighted. The current step is 'Select Your Organization Affiliation'. It contains a text box with 'University of Maine System' entered. Below the text box is a note: 'University of Maine System allows the use of a CITI Program username/password or Single Sign On (SSO) for access. Single Sign On (SSO) requires a username and password issued by University of Maine System.' There are two checkboxes, both checked: 'I AGREE to the Terms of Service and Privacy Policy for accessing CITI Program materials.' and 'I affirm that I am an affiliate of University of Maine System.' At the bottom are two buttons: 'Continue To Create Your CITI Program Username/Password' and 'Continue To SSO Login / Instructions', separated by the word 'or'.

- d. Under “Associate your SSO account with a CITI Program account” click “I don’t have a CITI Program account and I need to create one.”
 - i. Click the button that appears below labeled “Create A New CITI Program Account.”

- ii. This will automatically create an account for you using your UMaine SSO (Single Sign-On), the same login information used to log into the UMaine Portal, etc. You should also receive a confirmation email via your maine.edu email address with this information.

II. Log into CITI as an Existing User

- a. To log into CITI once you have established your CITI account, go to [CITI Program \(https://about.citiprogram.org/\)](https://about.citiprogram.org/) and click the blue “Log In” button located in the upper right hand corner of the homepage.



- b. On the login page, click the center option labeled “Log In Through My Organization.”
- c. On the list of organizations that appears, click on “University of Maine System” and you will be logged in using your UMaine SSO.
- d. NOTE: if you already had an account set up with CITI from another institution, you can affiliate that existing account with UMaine. See [instructions from CITI on how to add/change your affiliated institution.](#)

III. Enroll in CITI Courses

a. New Users

- i. After you enroll, you will be brought to your “My Courses” page. Under “Institutional Courses,” click the button next to University of Maine System labeled “View Courses.”

Institutional Courses

Institutional Courses are available to learners who have an affiliation with one or more subscribing institutions. If an institution with which you are affiliated is not listed, you may want to [add an affiliation](#). If you are no longer associated with a listed institution, you may want to [remove an affiliation](#).

University of Maine System	View Courses
Would you like to affiliate with another Institution?	Add Affiliation
Would you like to remove an existing affiliation?	Remove Affiliation

- ii. You will be brought to the “Select Curriculum” page. Select any desired course(s) from the list. **See section IV (Required Trainings) of this document for details on which specific trainings are required for each area of research.**
- iii. Once you have made your selection(s), hit the “Submit” button at the bottom of the page (Note: you are able to sign up for additional courses later, after you have made this initial selection – see section III.b [Returning Users] of this document for instructions).

b. Returning Users

- i. After logging into CITI as a returning user, you will be brought to the “My Courses” page. Click on the “View Courses” button next to the University of Maine System (as shown above under New Users).
- ii. On this page, you will see a list of all courses you are currently enrolled in and have previously completed.
- iii. To enroll in another course, scroll to the very bottom of the page to the section labeled “Learner Tools for University of Maine System.” Click the link for “Add a Course.”
- iv. You will be brought to the “Select Curriculum” page. Select any desired course(s) from the list. **See section IV (Required Trainings) of this document for details on which specific trainings are required for each area of research compliance.**

IV. Required Trainings

PLEASE NOTE: You are only required to take the trainings for your specific area(s) of research compliance.

If you are unsure of which trainings may be required for your research, please explore the resources available on the [ORC website](#) and reach out to the ORC for additional guidance as needed.

Once you know which trainings are required for your research, find the relevant compliance area below and follow the instructions to sign up. See section III (Enroll in CITI Courses) of this document for instructions on how to enroll as a new or existing CITI users.

a. Animal Care

- i. Visit [Animal Care on the ORC website](#) for guidance on when and for whom this training is required.
- ii. To enroll, on Question 6, select the required course “Working with the IACUC” (as shown below). In addition to the required “Working with the IACUC” course, we strongly recommend you take modules from these sections that apply to your research.

Question 6

Laboratory Animal Welfare

Do you conduct studies that use Lab animals?

1. If YES, then you must complete the Basic course and the appropriate electives and species specific modules.
2. If you are an IACUC Member you should complete the “Essentials for IACUC Members”.
3. Choose the appropriate species specific electives according to your research interests.

- ☒ “Working with the IACUC Course” is required if you plan to use lab animals in your work.
- ☐ If you are an IACUC Member you are required to complete the “Essentials for IACUC Members” course now.
- ☐ Post-Approval Monitoring (PAM)
- ☐ Species Specific Modules
- ☐ I work with Mice. Family: Muridae Cricetidae
- ☐ I work with Rats. Genus: Rattus
- ☐ If you plan to conduct studies that have the potential to cause “more than momentary pain and distress” in Mice or Rats you should complete the module on “Minimizing Pain and Distress”.
- ☐ I work with Frogs, Toads or other Amphibians
- ☐ I work with Swine

List continues – see the CITI enrollment page for the full list of available modules. In addition to the required “Working with the IACUC” course, we strongly recommend you take modules from these sections that apply to your research.

b. Biosafety

- i. Visit [Biosafety on the ORC website](#) for guidance on when and for whom this training is required.
- ii. To enroll, on Question 7, select the following 4 courses:
 1. Introduction to Biosafety
 2. Basic Biosafety Training (Note: after enrollment, on My Courses page, the title will appear as “Training for Investigators, Staff and Students Handling Biohazards.”)
 3. Select Agents, Biosecurity and Bioterrorism
 4. NIH Recombinant DNA (rDNA) Guidelines

Question 7

Biosafety/Biosecurity

Please make your selection below to receive the courses in the Biosafety/Biosecurity Course.

- ☒ Introduction to Biosafety
- ☒ Basic Biosafety Training
- ☐ Biosafety Retraining
- ☐ Animal Biosafety
- ☐ Shipping and Transport of Regulated Biological Materials
- ☐ OSHA Bloodborne Pathogens
- ☒ Select Agents, Biosecurity and Bioterrorism
- ☐ Emergency and Incident Response to Biohazard Spills and Releases
- ☐ Human Gene Transfer Trials
- ☒ NIH Recombinant DNA (rDNA) Guidelines
- ☐ OSHA Personal Protective Equipment Training
- ☐ Institutional Biosafety Committee Member
- ☐ Biosafety Complete Training
- ☐ USDA Permits
- ☐ Dual Use Research of Concern (DURC)
- ☐ Hazard Communication

c. Conflict of Interest

- i. Visit [Conflict of Interest on the ORC website](#) for guidance on when and for whom this training is required.
- ii. To enroll, on Question 5, select “Conflicts of Interest (All OTHER University of Maine System Campuses).”

Question 5

Conflicts of Interest

Check the box for the applicable UMS Campus:

- ☐ Conflicts of Interest (University of Southern Maine Campus ONLY)
- ☒ Conflicts of Interest (All OTHER University of Maine System Campuses)

d. Export Control

- i. Visit [Export Control on the ORC website](#) for guidance on when and for whom this training is required.
- ii. To enroll, on Question 8, select “CITI Export Controls.” (Note: after enrollment, on My Courses page, the title will appear as “CITI Export Controls Course.”)

Question 8

CITI US Export Control Regulations

Please make your selection below to receive the CITI US Export Control Regulations course.

- ☒ CITI Export Controls
- ☐ Not at this time.

e. Human Subjects

- i. Visit [Human Subjects on the ORC website](#) for guidance on when and for whom this training is required.
- ii. On Question 1, select one learner group based on your role and the research you will be conducting. You will be able to go back and add another learner group later on, if needed.
 1. The most common selection is “Social & Behavioral Research Investigators,” shown below. (Note: after enrollment, on My Courses page, the title will appear as “Social & Behavioral Research - Basic/Refresher.”)
 2. The Biomedical Research Investigators course can be selected for researchers that are conducting mostly biomedical research.

Question 1

Human Subjects Research

Please choose one learner group below based on your role and the type of human subjects activities you will conduct. You will be enrolled in the Basic Course for that group.

- ☐ Biomedical Research Investigators: Choose this group to satisfy CITI training requirements for Investigators and staff involved primarily in Biomedical research with human subjects.
- ☒ Social & Behavioral Research Investigators: Choose this group to satisfy CITI training requirements for Investigators and staff involved primarily in Social and Behavioral research with human subjects.
- ☐ IRB Members: This Basic Course is appropriate for IRB or Ethics Committee members.
- ☐ Research with data or laboratory specimens- ONLY: No direct contact with human subjects.
- ☐ Social Behavioral (Español)

f. Responsible Conduct of Research

- i. Visit [Responsible Conduct of Research on the ORC website](#) for guidance on when and for whom this training is required.
- ii. On Question 4, select “General Responsible Conduct of Research Course.” (Note: after enrollment, on My Courses page, the title will appear as “General RCR.”)

Question 4

Responsible Conduct of Research (RCR)

If you want to take Responsible Conduct of Research (RCR) Course, please make your selection below.

- ☒ General Responsible Conduct of Research Course

As a reminder, please note that you are only required to take the trainings for your specific area(s) of research compliance. If you are unsure of which trainings may be required for your research, please explore the resources available on the [ORC website](#) and reach out to the ORC for additional guidance as needed.

V. Access CITI User Records and Reports

- a. Users can access training records and Completion Reports through the “My Records” link in the menu bar at the top of the CITI page.
- b. CITI will automatically alert ORC when you complete training, however there is a slight delay. ORC is also able to view in CITI when your training is complete. Please do not need to send copies of completion reports to ORC.
 - i. If you require immediate assistance (i.e. you've just completed Financial Conflicts of Interest training and need access to PARS), please contact sponsored@maine.edu.
 - ii. For all other CITI training inquiries, please contact umric@maine.edu.

Office of Research Compliance

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Financial Conflict of Interest

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[Definitions](#)
[Policy & Procedures](#)
[Resources](#)

Example of a Significant Financial Interest and Potential Conflict of Interest Proposal Narrative

The following is a one paragraph example of a significant financial interest and potential conflict of interest description that could be inserted into a proposal narrative.

Financial Disclosure

The University of Maine is the owner of patents developed by Professor Hugh X. Warren and other University of Maine inventors. The patents will be further explored (or developed, as the case may be, according to the research scope of work) as part of the research contemplated in this proposal. The University of Maine, Professor Warren, and the other inventors have equity interests in the licensee of these patents, QUIET ENERGY, LLC. Professor Warren and the other University-based inventors have developed, or are developing, Conflict of Interest Mitigation plans that manage or eliminate the conflict. These plans will be in place and approved prior to execution of any award by the University. Adherence of project personnel to these plans will be monitored by the University's Vice President for Research.



PARS Submission No. _____

PI Certification Statement

As Principal Investigator I agree:

a) Conduct
If the proposal is funded to i) accept responsibility for the scientific and ethical conduct of the project, ii) conduct the project in accordance with the terms and conditions of the sponsoring agency and the policies of the University, and iii) be fully responsible for meeting the requirements of the award, including providing proper stewardship of sponsored funds and submitting all required technical reports and deliverables on a timely basis.
b) Financial Conflict of Interest
Having taken the required on-line CITI Conflict of Interest training and reviewed UMaine's Policies and Procedures for Financial Disclosures and Conflicts of Interest :
<input type="radio"/> I DO NOT have a significant financial interest in the proposed project.
<input type="radio"/> I DO have a significant financial interest in the proposed project AND will prepare a Significant Financial Interest Disclosure Form and submit it to the Office of Research Compliance (ORC). I understand this information must be received by ORC before a proposal will be submitted by the Office of Research Administration.
c) Debarment and Suspension
I will disclose to the Office of Research Administration, in writing upon immediate notice of the official action, if I am presently debarred, suspended, proposed for debarment, declared ineligible, or voluntarily excluded from current transactions by any federal department or agency as described in 2 CFR §200.213 Suspension and debarment .
d) Mandatory Disclosures
I will disclose to the Office of Research Administration, in writing within 14 days of the official action, all violations of Federal criminal law involving fraud, bribery, or gratuity violations potentially affecting a Federal award in compliance with 2 CFR Part 200.113 Mandatory Disclosures .
e) Federal Debt Delinquency
No individual listed in the proposal, including myself, are presently delinquent in repaying any Federal debt such as Federal income tax obligations or a loan from a Federal Agency in compliance with the Federal Debt Collection Procedure Act, 28 U.S.C. 3201(e).
f) Lobbying Disclosure
For Awards with total costs which exceed \$100,000, no individual listed in the proposal, including myself, has or will lobby any Federal Agency on behalf of the award, continuation, renewal, amendment or modification.
g) Award Management
If funded, I will abide by all policies and procedures as detailed in the document Award Management: Role and Responsibilities of a Principal Investigator at the University of Maine

By submission of this Certification, I certify that I have reviewed, understand and agree to comply with the above policies.

Principal Investigator Signature: _____ **Date:** _____

Printed name of Principal Investigator: _____

Dept Chair, School/Institute/Center Director Signature: _____ **Date:** _____

Printed name of Dept Chair, School/Institute/Center Director: _____

PI Certification Statement Guide

Each PI and Co-PI certifies with every proposal submission that all information provided is true and complete and that the proposal conforms to the University policies and procedures applicable to sponsored activities. In addition, each PI or Co-PI must confirm that he/she will comply with all regulatory compliance directives; that all information submitted within the proposal is true, complete, and accurate to the best of his/her knowledge; that any false, fictitious, or fraudulent statements or claims may subject the investigator(s) to criminal, civil, or administrative penalties; and that the investigators(s) agree to accept responsibility for the conduct of the project and to provide all required reports as applicable if a project is awarded as a result of the proposal.

a) Conduct

Standards for the responsible and ethical conduct of research are set forth by Federal and State regulations, institutional policies, professional codes of conduct, and personal convictions. At the Federal level (Refer to [42 CFR Part 93](#)), the U.S. Department of Health & Human Services [Office of Research Integrity](#) (ORI) is vested with the authority to develop policies, procedures, and regulations for the detection, investigation, and prevention of research misconduct. Incorporating ORI's principles, the policies and procedures of the University of Maine System and the University of Maine reflect a strong institutional commitment to fostering an environment in which the highest ethical standards in the conduct of research and other scholarly activities are not only expected, but required. Primary responsibility for maintaining such standards in the pursuit and dissemination of knowledge rests with the faculty, collaborating staff members, and students. Every individual engaged in research and other scholarly activities is expected to be fully aware of the regulations and ethical guidelines governing his/her discipline. Failure to comply can result in penalties ranging from administrative to civil or criminal for both the institution and the individual(s).

For more information:

<https://umaine.edu/research-compliance/responsible-conduct-research/>

b) Financial Conflict of Interest

Federal regulations require institutions to have policies and procedures in place to ensure that investigators disclose any significant financial interest that may present a conflict of interest in relation to externally sponsored projects. Such interests can threaten –or seem to threaten – the integrity of educational programs and research agendas, the free dissemination of scholarship, and the appropriate use of public resources for public benefit. Disclosures of this nature must be made PRIOR to the submission of a proposal for funding and institutions must develop specific mechanisms by which conflicts of interest will be satisfactorily managed, reduced or eliminated prior to acceptance of an award.

Responsibilities of UMaine 'Investigators':

- Understand the University of Maine's Definitions, Policies and Procedures
- Prior to submitting a request for extramural funding, successfully complete the required FCOI training, and certify whether or not you have a significant financial interest related to the proposed activity.
- Any 'investigator' having such an interest must complete a *Significant Financial Interest Disclosure Form* and in certain circumstances follow an approved Conflict Resolution Plan.

For more information:

c) Debarment and Suspension

The federal government-wide debarment and suspension system requires grant applicants to certify that, to the best of their knowledge and belief, that neither they, their principals, including PIs and other key personnel are presently debarred, suspended, proposed for debarment, declared ineligible or voluntarily excluded from covered transactions by any Federal Agency or department. The debarment and suspension process, (as noted in [2 CFR §200.213 Suspension and debarment](#)) protects the federal government from fraud, waste and abuse by using a number of tools to avoid doing business with non-responsible contractors. Suspensions and Debarments are the most widely known tools as these actions are visible to the public via SAM (www.sam.gov). Principal Investigators are required to notify the Office of Research Administration if they are debarred, suspended, proposed for debarment, declared ineligible, or voluntarily excluded from current transactions by any federal department or agency as described in this section. Failure to declare has several consequences, which will ultimately result in funding being withdrawn and proposals in submission not being reviewed. Non-federal entities are also subject to the non- procurement debarment and suspension regulations (implementing Executive Orders 12549 and 12689, [2 CFR part 180](#)). These regulations restrict awards, subawards, and contracts with certain parties that are debarred, suspended, or otherwise excluded from or ineligible for participation in Federal assistance programs or activities.

d) Mandatory Disclosures

The non-Federal entity or applicant for a Federal award must disclose, in a timely manner, in writing to the Federal awarding agency or pass-through entity all violations of Federal criminal law involving fraud, bribery, or gratuity violations potentially affecting the Federal award. Failure to make required disclosures can result in any of the remedies described in [2 CFR § 200.338 Remedies for noncompliance](#), including suspension or debarment.

For more information:

https://www.ecfr.gov/cgi-bin/text-idx?node=se2.1.200_1113&rgn=div8

e) Federal Debt Delinquency

The Federal Debt Collection Procedure Act, [28 U.S.C. 3201\(e\)](#), provides that an organization or individual that is indebted to the United States and has a judgment lien filed against it is ineligible to receive a Federal grant. Before a grant can be awarded, the applicant organization must certify that neither it nor any person to be paid from grant funds is delinquent in repaying any Federal debt. If the applicant discloses delinquency on a debt owed to the Federal Government, the federal funding agency may not award the grant until the debt is satisfied or satisfactory arrangements are made with the agency to which the debt is owed. In addition, once the debt is repaid or satisfactory arrangements made, the funding agency will still take that delinquency into account when determining whether the applicant would be responsible with respect to a grant, if awarded.

Anyone who has been judged to be in default on a Federal debt and who has had a judgment lien filed against him or her should not be listed as a participant in an application for grant support until the judgment is paid in full or is otherwise satisfied. No funds may be re-budgeted following an award to pay such an individual. The federal funding agency will disallow costs charged to awards that provide funds to individuals in violation of this Act.

f) Lobbying Disclosures

Recipients of Federal grants, cooperative agreements, contracts, and loans are prohibited by, [31 U.S.C. 1352](#) *Limitation on Use of Appropriated Funds to Influence Certain Federal Contracting and Financial Transactions*, from using Federal (appropriated) funds to pay any person for influencing or attempting to influence any officer or employee of an agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress with respect to the award, continuation, renewal, amendment, or modification of any of these instruments.

Applicants for awards with total costs expected to exceed \$100,000 are required to certify that they (a) have not made, and will not make, such a prohibited payment; (b) will be responsible for reporting the use of non-appropriated funds for such purposes; and (c) will include these requirements in consortium agreements and contracts under grants that will exceed \$100,000 and obtain necessary certifications from those consortium participants and contractors. The signature of the authorized institutional official on the application serves as the required certification of compliance.

Federal appropriated funds may not be used to pay the salary or expenses of an employee of a grantee or contractor or those of an agent related to any activity designed to influence legislation or appropriations pending before Congress or any State legislature. This prohibition extends to the use of funds for publicity or propaganda purposes, including the preparation, distribution, or use of any kit, pamphlet, booklet, publication, radio, television, or video presentation designed to support or defeat legislation pending before Congress or a State legislature except in presentation to the Congress or State legislature itself or as part of normal, recognized legislative-executive relationships.

For more information:

<https://lobbyingdisclosure.house.gov/lda.html>

g) Award Management

The process of managing sponsored projects is a shared responsibility between the PI, the department, and the Office of Research Administration (ORA), and each has unique areas of responsibility.

ORA staff assist PIs to manage sponsored projects by providing services which include but are not limited to:

- a comprehensive review of sponsor award terms and conditions, which includes negotiation and formal acceptance of the award
- subaward negotiation and acceptance
- project account set-up
- project invoicing and draw down of funds
- financial reporting
- time and effort reporting
- project close out

The PI has primary responsibility for accomplishing the technical goals of the project, while also complying with the Financial and administrative policies and regulations associated with the award. PI's should meet with their department administrative and/or financial manager to review charges in a timely manner. The fundamental responsibilities of the PI include:

- execute the project as outlined in the approved award
- authorizing only those expenditures that are reasonable and necessary to accomplish the project goals and are consistent with the sponsor's terms and conditions
- monthly reviews of project budgets; addressing budget discrepancies and errors promptly
- reporting project progress to the sponsor as outlined in the terms of the award
- complying with all University policies and procedures related to project management and personnel practices
- complying with all applicable sponsor rules, regulations and/or terms and conditions of the award

For more information:

<http://www.pars.umesp.maine.edu/ORAWeb/Policies/PIResp.pdf>

PARS Submission No. _____

Certification Statement

As Co-Principal Investigator I agree:

a) Conduct
If the proposal is funded to i) accept responsibility for my role in the scientific and ethical conduct of the project, ii) conduct the project in accordance with the terms and conditions of the sponsoring agency and the policies of the University, and iii) be fully responsible for my role in meeting the requirements of the award, including providing proper stewardship of sponsored funds and supporting the submission of all required technical reports and deliverables on a timely basis.
b) Financial Conflict of Interest
Having taken the required on-line CITI Conflict of Interest training and reviewed < UMaine's Policies and Procedures for Financial Disclosures and Conflicts of Interest >: <input type="radio"/> I DO NOT have a significant financial interest in the proposed project. <input type="radio"/> I DO have a significant financial interest in the proposed project AND will prepare a < Significant Financial Interest Disclosure Form > and submit it to the Office of Research Compliance (ORC). I understand this information must be received by ORC before a proposal will be submitted by the Office of Research Administration.
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By submission of this PARS, I certify that I have reviewed, understand and agree to comply with the above policies.

Co-Principal Investigator Signature: _____ **Date:** _____

Printed name of Co-Principal Investigator: _____

Dept Chair, School/Institute/Center Director Signature: _____ **Date:** _____

Printed name of Dept Chair, School/Institute/Center Director: _____

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For more information:

<https://umaine.edu/research-compliance/financial-conflict-of-interest/policy-procedures/>

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presently debarred, suspended, proposed for debarment, declared ineligible or voluntarily excluded from covered transactions by any Federal Agency or department. The debarment and suspension process, (as noted in [2 CFR §200.213 Suspension and debarment](#)) protects the federal government from fraud, waste and abuse by using a number of tools to avoid doing business with non-responsible contractors. Suspensions and Debarments are the most widely known tools as these actions are visible to the public via SAM (www.sam.gov). Co-Principal Investigators are required to notify the Office of Research Administration if they are debarred, suspended, proposed for debarment, declared ineligible, or voluntarily excluded from current transactions by any federal department or agency as described in this section. Failure to declare has several consequences, which will ultimately result in funding being withdrawn and proposals in submission not being reviewed. Non-federal entities are also subject to the non-procurement debarment and suspension regulations (implementing Executive Orders 12549 and 12689, [2 CFR part 180](#)). These regulations restrict awards, subawards, and contracts with certain parties that are debarred, suspended, or otherwise excluded from or ineligible for participation in Federal assistance programs or activities.

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For more information:

<https://lobbyingdisclosure.house.gov/lda.html>

g) Award Management, if applicable

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- reporting project progress to the sponsor as outlined in the terms of the award
- complying with all University policies and procedures related to project management and personnel practices
- complying with all applicable sponsor rules, regulations and/or terms and conditions of the award

For more information:

<http://www.pars.umesp.maine.edu/ORASWeb/Policies/PIResp.pdf>

Financial Conflict of Interest

FCOI Overview

Definitions

Policy & Procedures

Resources

Resources

- [National Institutes of Health \(NIH\) Financial Conflicts of Interest FAQ](#)
- [Significant Financial Interest Disclosure Form \(PDF\)](#)
- [SUBRECIPIENT ONLY – Investigator Financial Conflict of Interest Certification \(PDF\)](#)
- [UMaine Policies and Procedures for Financial Disclosures and Conflicts of Interest in Extramurally Sponsored Activities \(PDF\)](#)
- [University of Maine System Conflicts of Interest Policy](#)



Policy Manual – Conflict of Interest

Board of Trustees

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Contact Information

University of Maine System
Board of Trustee Office
15 Estabrooke Drive, Office 251
Orono, ME 04469
207-581-5844
ums.trustees@maine.edu

HUMAN RESOURCES AND LABOR RELATIONS

Section 410 Conflict of Interest

Effective: 5/20/91

Last Revised: 11/16/98

Responsible Office: Human Resources

Policy Statement:

APPLIES TO: All Officers and Employees

To ensure continued confidence of the people of Maine in the University and its personnel, individuals serving the University shall at all times act in a manner consistent with their public responsibilities to the University and shall exercise particular care that no real or perceived detriment to the University results from conflicts between personal interests and those of the University. Conflict of interest situations, or the appearance of conflicts of interests, have the potential to result in serious harm and direct losses to the University. The losses are often difficult to detect and include not only direct monetary losses and loss of confidence in the University, but also negative publicity and erosion of employee morale.

It is the policy of the University that its officers, faculty, staff and others acting on its behalf have the obligation to avoid ethical, legal, financial or other conflicts of interest and to ensure that their activities and interests do not conflict with their obligation to the University or to its welfare.

This policy applies to all University officers and employees. The policy also applies to persons affiliated or associated with the University, including members of advisory boards to the University. All provisions, except those relating to outside employment, apply to persons affiliated with the University. This policy does not apply to the Board of Trustees who are already covered by similar provisions in the Board's Financial Code of Ethics and State Law.

The policy is to be interpreted and applied in a manner that will best serve the interests of the University and that distinguishes between those minor and inconsequential conflicts which are unavoidable and those conflicts which are substantial and material. A conflict of interest may exist when an employee, a close relative, or a person or organization with whom the employee is associated has an existing or potential financial or other interest which involves the employee's University responsibilities.

The policy does not prohibit an employee from freely pursuing those teaching, research, and professional and public service activities which will not result in such a conflict, nor prohibit an employee from accepting pay, compensation, fees, honoraria, or reimbursement of expenses which may be offered in connection with such activities.

Procedures:

Disclosure and Consultation: The following procedures apply except in situations where a procedure is otherwise provided by a collective bargaining agreement. Each university shall develop its procedure for disclosure and consultation within the following parameters.

If an employee believes that he or she may have a conflict of interest, the employee shall promptly and fully disclose the conflict to the appropriate administrator (Chancellor or President's designee) and shall refrain from participating in any way in the matter to which the conflict relates until the conflict question has been resolved.

1. When it appears that a material conflict may arise between the personal interest of an employee and his or her responsibilities to the University, the employee shall notify the appropriate administrator by submitting a written statement describing the nature of the possible conflict. If an apparent conflict comes to the attention of the administrator, that individual may request a written statement from the employee.

2. If an employee is in doubt as to whether he or she is confronted with a potential conflict of interest, the employee shall consult with the appropriate administrator to determine if the outside interests could conflict impermissibly with employee's obligations to the University.
3. The appropriate administrator promptly shall notify the employee or associate in writing that: (a) there is no conflict and the employee may proceed; or (b) there may be a conflict and further consultation is necessary prior to reaching a determination; or (c) there is a conflict and the employee shall not proceed with his or her personal interest which results in the conflict. In some cases it may be determined that after full disclosure, the University's interests are best served by participation of the employee despite the conflict or appearance of conflict.
4. The employee may appeal the administrator's decision to the President (Chancellor for System Office employees).
5. The employee must report any significant changes in the outside interest that occur during the year and consult with the appropriate administrator if the undertaking of a new outside interest is considered.
6. Any significant violations of this policy shall be reported to the Chancellor for System Office employees and Presidents, to the President for university employees and to the Human Resources and Labor Relations Committee of the Board of Trustees for the Chancellor.

Related Documents:

[Situations which may Constitute a Conflict of Interest](#)



SITUATIONS WHICH MAY CONSTITUTE A CONFLICT OF INTEREST:

1. Personal Gain from University Position

- a. An employee may not use or attempt to use, in a manner contrary to the interests of the University, his or her position or University property or services, to gain or attempt to gain anything for the private benefit of the employee.
- b. An employee may not solicit or receive gifts or entertainment from suppliers of goods or services, or from persons associated with or seeking association with the University.
- c. An employee shall not use confidential information acquired in connection with University related activities for personal gain or for other unauthorized purposes.

2. Contracting and Leasing

- a. An employee may not enter into any contract or lease with the University, if the employee is in a position to approve or influence, in his or her official capacity, the University's decision to enter into the contract or lease, unless such contract is deemed in the best interests of the University and has the approval of the appropriate administrator.
- b. If the employee is not in a position to approve or influence the University's decision, the employee may enter into a contract or lease, provided the employee makes prior written disclosure of the nature and extent of any relationship to the appropriate administrator and obtains written approval. The administrator shall approve an employee's interest in a lease or contract unless the administrator determines that the employee's personal interest in the agreement will conflict substantially and materially with the employee's discharge of his or her University responsibilities.
- c. An employee may not contract with the University to provide a service which is the same as or similar to the service that the employee provides as a University employee. Such services may be provided only as a University employee in the course of University employment.

3. Outside Commitment

- a. Employees are permitted to engage in outside consulting activities and other outside activities provided the employee meets his/her obligation to the University and complies with any applicable provisions of a collective bargaining agreement concerning outside employment.
- b. An employee shall not accept any outside position that would impair the employee's ability to fulfill the employee's obligations to the university.
- c. An employee with faculty rank shall not take on a teaching assignment in another post-secondary educational institution during the academic year except after obtaining written approval of the appropriate administrator.

d. An employee shall not engage in outside employment or activities which could be viewed as impairing the employee's judgment in the performance of University duties and responsibilities.

4. Use of University Name and Resources

a. An employee shall not use the official title of the University or any of its parts, in whatever form that title may appear, except in connection with legitimate University purposes.

b. The University's name, facilities, equipment, stationery, supplies, personnel and other resources are to be used only for the furtherance of the University's mission. An employee shall not make unauthorized use of any University resources, including the services of University employees, for the personal benefit of the employee.

5. Nepotism

a. Close relatives may be employed in the same or different departments of the University. For purposes of this policy, the term "close relative" shall include significant others in the household.

b. The fact that an employee is a close relative of another employee in the same or different department shall not be used as a basis for denying to the employee the rights, privileges or benefits of regular appointment or regular job status. Alternative arrangements for supervisory decisions must be made before employment of a close relative.

c. An employee shall not participate in institutional decisions involving a direct benefit to a close relative. Such decisions include, but shall not be limited to, initial appointment, retention, promotion, tenure, salary and leave of absence.

d. An employee may not give preferential or favored treatment in the supervision or management of another University employee who is a close relative.

e. The University reserves the right to reassign employees or duties when deemed a prudent business or management practice.

f. A close family relationship shall not be used as a basis for denying a student the rights, privileges or benefits of access to academic resources.

g. An employee shall not participate in institutional academic decisions involving a direct benefit to a close relative. Alternative arrangements for academic decisions must be made for close relatives.

Academic decisions include, but are not limited to, acceptance to an academic program, evaluation of the honors, masters or doctoral thesis, and recommendation for awards or employment.