

## University Rule

### 15.01.03.J1 Financial Conflicts of Interest in Sponsored Research

Approved: September 8, 2025

Next Scheduled Review: September 8, 2030

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#### Rule Summary

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Texas A&M University-Victoria (A&M-Victoria) is committed to conducting research and educational activities in a manner consistent with the highest standards of integrity and ethics. This rule is adopted to promote objectivity in research and to ensure that the research and educational activities are conducted in a manner free from bias resulting from a financial conflict of interest (FCOI). This rule implements the requirements of The Texas A&M University System (System) Regulation *15.01.03, Financial Conflicts of Interest in Sponsored Research*.

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#### Definitions

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Definition of terms used in this rule are in the System Regulation, [\*15.01.03 - Financial Conflicts of Interest in Sponsored Research\*](#).

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#### Rule

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##### 1. APPOINTMENT OF CONFLICT OF INTEREST OFFICIAL (COI)

The director of Research and Sponsored Programs serves as the conflict of interest official (COI Official) and is responsible for the solicitation and review of significant financial interests for A&M-Victoria. The COI official will fulfill the responsibilities outlined in System Regulation *15.01.03* for reviewing disclosures of significant financial interests (SFIs) and managing and reporting FCOI.

##### 2. DISCLOSURE AND REVIEW

2.1 As per System Regulation *15.01.03*, all university employees and students who are investigators are required to submit financial disclosure statements to the A&M-Victoria COI official.

2.2 In accordance with System Regulation *15.01.03* and federal requirements, the COI official or designee will examine all financial disclosure statements made by investigators to ascertain whether any disclosed SFIs constitute an FCOI. A Conflict of Interest Review Committee (CIRC), composed of individuals representing a cross-section disciplines, may be appointed by the COI official to determine whether an FCOI is present. The COI official determines the scope of the CIRC, which may be applied to one or more specific FCOI reviews. To help determine whether an SFI is connected to the investigator's study and research activities, the COI official and/or CIRC may consult with the investigator and unit head(s). The COI official will create a management plan outlining the steps to manage, lower, or eliminate the FCOI if one exists. Before any sponsored research funding is used, all FCOIs that the COI official has identified will be adequately managed, minimized, or eliminated.

2.3 The System Chief Research Compliance Officer, System Ethics and Compliance Officer, and/or the Office of General Counsel may be consulted as appropriate.

### 3. MONITORING

Each investigator conducting research under a management plan must comply fully and promptly with the plan. The COI official, or designee, is responsible for conducting periodic reviews of financial disclosure statements and management plans to determine individual and institutional compliance. The COI official must report instances of noncompliance as required in System Regulation *15.01.03* and federal law.

### 4. TRAINING AND CERTIFICATION

System Regulation *15.01.03* mandates that investigators undergo training. Every year, each investigator is required to attest that they have read and understand System Regulation *15.01.03* as well as their obligations regarding SFI disclosure.

### 5. PUBLIC ACCESSIBILITY

5.1 The COI official will ensure this rule is available through a publicly accessible website.

#### 5.2 Public Health Service (PHS) Funded Research

If the COI official determines that an FCOI exists that is related to PHS-funded research, the COI official will coordinate with the appropriate public information officer to make the following information available in writing to any requestor within five business days after receipt of a request, so long as the investigator still holds the SFI:

- (a) The name of the investigator;
- (b) The title and role of the investigator in relation to the affected research;
- (c) The name of the entity in which the SFI is held;
- (d) A description of the SFI that was determined to be an FCOI; and

- (e) The approximate dollar value of the SFI. If the dollar value cannot be determined by reference to publicly available prices or another reasonable method, the system member must include a statement to that effect. Dollar values may be provided within ranges, e.g. \$0-\$4,999; \$5,000-\$10,000; \$10,000-\$20,000; \$20,000-\$50,000; \$50,000-\$100,000. Amounts over \$100,000 may be stated in increments of \$50,000.

### 5.3 Non-PHS Funded Research

For all public information requests related to non-PHS-funded research, the COI official will work with the appropriate public information officer to ensure that responses to requests comply with Texas Government Code, Chapter 552.

## 6. OTHER CONSIDERATIONS

In addition to the issues addressed in System Regulation *15.01.03* and this rule, there may be other ethical considerations that are separate and distinct from COI questions, including but not limited to those relating to external employment and conflict of commitment. The primary responsibility of employees of A&M-Victoria is to accomplish the duties and responsibilities assigned to the employee's position of appointment. External consulting or other outside employment should not interfere with those duties and responsibilities as set forth in system policies and related regulations.

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## Related Statutes, Policies, or Requirements

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42 C.F.R. [Part 50, Subpart F](#)

45 C.F.R. §§ [74-53\(b\)](#), [92-42\(b\)](#), and [Part 94](#)

[NSF Proposal & Award Policies & Procedures Guide \(PAPPG\)](#)

[Texas Government Code Ch. 552](#)

System Policy [15.01, Research Agreements](#)

System Regulation [15.01.03, Financial Conflicts of Interest in Sponsored Research](#)

System Policy [07.01, Ethics](#)

System Policy [31.05, External Employment and Expert Witness](#)

System Regulation [31.05.01, Faculty Consulting and/or External Professional Employment](#)

System Regulation [31.05.02, External Employment](#)

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## **Contact Office**

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