



Title: Conflict of Interest Policy for Sponsored Programs
Effective Date: July 1, 2008
Issuing Authority: Provost
Policy Contact: Senior Vice Provost for Research
Provost@mercer.edu, 478-301-2110

Purpose

The purpose of this policy is to set forth the University's policy and procedures regarding conflict of interest related to sponsored programs.

Scope

This policy applies to faculty and staff with sponsored programs.

Exclusions

None

Definitions

As used in this policy, the following term(s) have the meaning specified below:

Conflict of Interest: as defined by 2 CFR Part 215 (formerly OMB Circular A-110), when the employee, officer, or agent, any member of his or her immediate family, his or her partner, or an organization which employs or is about to employ any of the parties indicated herein, has a financial or other interest in the firm selected for an award. The officers, employees, and agents of the recipient shall neither solicit nor accept gratuities, favors, or anything of monetary value from contractors, or parties to sub-agreements.

Policy Statement

In accordance with 2 CFR Part 215 (formerly OMB Circular A-110), no employee, officer, or agent shall participate in the selection, award, or administration of a contract supported by federal funds if a real or apparent conflict of interest would be involved.

Additional Resources

Procedures

By signing the Proposal Transmittal Form required for each sponsored program application, the Principal Investigator (PI) certifies that he/she will abide by the University's conflict of interest policy. According to the policy, it is the responsibility of the PI to disclose any real or apparent

conflict of interest. If no conflict of interest existed at the time of the initial proposal but such a conflict arises during the project or the effective dates of the agreement, the investigator shall disclose the conflict of interest as soon as facts creating the conflict become known.

If the Grants and Contracts Office becomes aware of any real or perceived conflict of interest during the proposal review or the life of the agreement, this information will be provided to General Counsel for review. It will be at the discretion of General Counsel to determine if disclosure is needed and what additional steps or actions may be necessary to reduce, mitigate or eliminate the conflict of interest. If the sponsoring agency must be notified, the Grants and Contracts Office will work with General Counsel and Compliance to provide the necessary information.

Website Address

Grants and Contracts Office: <https://grants.mercer.edu/>