

## 15.01.03.T1 Financial Conflicts of Interest in Sponsored Research



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Revised: February 5, 2026  
Next Scheduled Review: February 5, 2031

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### Rule Summary

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Tarleton State University (Tarleton State) is committed to conducting research and educational activities in a manner consistent with the highest standards of integrity and ethics. This rule is required by and implements the requirements of The Texas A&M University System (System) Regulation *15.01.03, Financial Conflicts of Interest in Sponsored Research*, in accordance with federal law and regulations, and adopted to promote objectivity in research and to ensure that research and educational activities at Tarleton State are conducted in a manner free from the appearance of a lack of impartiality resulting from financial conflicts of interest (FCOI).

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### Definitions

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[Definitions](#) from System Regulation 15.01.03 are incorporated by reference as if fully set forth herein.

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### Rule

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#### 1. APPOINTMENT OF CONFLICT OF INTEREST OFFICIAL

The President appoints the Vice President for Research, Innovation and Economic Development, or designee, as the University's Conflict of Interest Official (COI Official) for Tarleton State. The COI Official will perform the duties established in System Regulation *15.01.03* and any other duties as assigned by the President, as they relate to FCOI determinations and management.

#### 2. DISCLOSURE AND REVIEW

2.1 Each investigator must submit Financial Disclosure Statements to the Tarleton State COI Official as required in System Regulation 15.01.03 through the System's enterprise-wide web-based application that supports researchers and research administration.

- 2.2 In accordance with System Regulation 15.01.03 and federal regulations, the COI Official, or designee, will review all financial disclosure statements by investigators and determine whether any disclosed significant financial interest (SFI) is related to the investigator's research and whether an FCOI exists. If an FCOI exists, the COI Official will develop a Management Plan specifying the actions that will be taken to manage, reduce, or eliminate the FCOI in accordance with System Regulation 15.01.03. All FCOIs identified by the COI Official are required to be satisfactorily managed, reduced, or eliminated prior to the expenditure of any sponsored research funds.
- 2.3 The COI Official may appoint a designee or Conflict of Interest Review Committee (CIRC) to assist in the determination of whether an FCOI exists.
- 2.4 If the COI Official appoints a CIRC, the CIRC must be composed of investigators representing a cross-section of disciplines and at least one research administrator. The COI Official and/or CIRC may involve the investigator to assist in determining whether an SFI is related to the investigator's research or research activities. The System Ethics and Compliance Officer and/or the Office of General Counsel may be consulted as appropriate.
- 2.5 If the COI Official determines that an FCOI exists, the COI Official or designee will notify the investigator in writing and work with the investigator to develop a Management Plan specifying the steps to be taken to manage, reduce, or eliminate the FCOI in accordance with System Regulation 15.01.03.T1.
- 2.6 If an investigator disagrees with the COI Official's determination that an FCOI exists, the investigator may challenge the COI Official's determination to the President or designee in writing within 10 business days after receiving the COI Official's determination. The challenge must state:
  - (a) Why the investigator disagrees with the determination;
  - (b) How the SFI could not reasonably result in the influence or preference in the planning, conduct, or reporting of research; and
  - (c) Any other additional facts the investigator wishes to have considered.

The President or designee must provide the investigator with a written decision on their challenge within 30 business days. The decision of the President or designee is final.

### 3. NO EXPENDITURE OF RESEARCH FUNDS

There will be no expenditure of sponsored research funds by an investigator or Tarleton State unless the COI Official has determined that no FCOI exists or, if an FCOI has been identified, that it is manageable under the terms of a Management Plan that has been implemented.

#### 4. MONITORING AND ENFORCEMENT

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 will report instances of noncompliance as required in System Regulation *15.01.03* and federal law.

#### 5. TRAINING AND CERTIFICATION

Investigators must complete training as required in System Regulation *15.01.03*. In addition, each investigator will annually certify that they are aware of and have read System Regulation *15.01.03*, and this rule, and are aware of their responsibilities regarding disclosure of SFIs and applicable federal regulations.

#### 6. PUBLIC ACCESSIBILITY

6.1 The COI Official will ensure that this rule is available through a publicly accessible website.

##### 6.2 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 Tarleton State's Public Information Officer (PIO) 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, Tarleton State 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.

##### 6.3 Non-PHS-funded Research

For all public information requests related to non-PHS funded research, the COI Official will coordinate with Tarleton's PIO to ensure that responses to requests comply with Texas Public Information Act, Tex. Gov't Code, Chapter 552.

## 7. 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 FCOI questions, including but not limited to those relating to external employment and conflict of commitment. The primary responsibility of Tarleton State employees is the accomplishment of 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 regulations. Additional information regarding external consulting and other outside employment can be found in Tarleton State Rule *31.05.01.T1, Faculty Consulting and External Professional Employment*.

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### **Related Statutes, Policies, or Requirements**

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[42 C.F.R. Part 50, Subpart F – Promoting Objectivity in Research](#)

45 C.F.R. § [74.53\(b\)](#), [92.42\(b\)](#) and Part [94](#)

21 C.F.R. Parts [54](#), [312](#), [314](#), [320](#), [601](#), [807](#), and [812](#)

[Texas Government Code, Ch. 552](#)

[National Science Foundation Proposal & Award Policies & Procedures Guide \(PAPPG\)](#)

[System Policy 07.01, Ethics](#)

[System Policy 15.01, Research Agreements](#)

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

[System Regulation 15.99.03, Research Misconduct](#)

[Tarleton State Rule 15.99.03.T1, Research Misconduct](#)

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

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

[Tarleton Rule 31.05.01.T1, Faculty Consulting and/or External Professional Employment](#)

[System Regulation 31.05.02, External Employment](#)

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**Contact Office**

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