GRINNELL COLLEGE FINANCIAL CONFLICT OF INTEREST POLICY

In accordance with Federal regulations the College has a responsibility to manage conflicts of interest that arise in the course of projects funded by the U.S. governess ET BT 1 0 0640.9 Tm [(g)6s 0640 of ereqT 1 8L6(531(.S)6(.)] TJ

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value may not be eadily available), related to their institutional responsibilities provided, however, that this disclosive equirement does not apply to travel that is reimburse obrigore sponsore by a Federal, state, or local governmentagency an Institution of higher educations defined at 20 U.S.C. 1001(a), an acade mider chinghospital, a medical center, or a research institute that is affiliated with an Institution of higher education. The disclosuremustin clude, at a minimum, a statement of the purpose of the trip, the dentity of the sponsor, the destination and the duration of the trip.

SignificantFinar ialInteres (10569:500) (1056) 400 (1056)

- x Salaryroya les, or other remuneration paid by the Collegeto the Investigatoris the Investigatoris currently employed or otherwise appointed by the College;
- x Intellectua PropertyRightsassignedo the Collegeandagreementso sharein royaltiesrelatedto suchright;
- x Incomef om investment/vehicles, such as mutual funds and retirement accounts as long as the Investigator does not directly control the investment decisions made in these vehicles;

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the Collegewill, within 60 days, review the SFI, determined an FCOI exists and implementan interim managemental and in the College identifies an SFI that was not disclose observe viewed in a timely manner, the Deanshall, within 60 days, review the SFI, determined an FCOI exists and implementan interim managemental and, if needed.

Management of Financial Conflicts of Interest

The Deanwill performa review of

Prior to the expenditure of funds, the Collegewill provide a FCOI report to the PHS Awarding Component and ensure that a managemental implemented of a FCOI is obtained during the projector and Investigator new to the project has a FCOI, the Collegewill provide a report to the PHS Awarding Component within 60 days of identification and ensure that a managemental is implemented.

x If the SFI reportwas not