

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. government. 76 FR 52 ET BT 1 0 0640.9 Tm [(g)6s 06407ereqT 1 8L6(531(.S)6(.)] TJ









the College will, within 60 days, review the SFI, determine if an FCOI exists and implement an interim management plan, if needed. If the College identifies an SFI that was not disclosed or reviewed in a timely manner, the Dean shall, within 60 days, review the SFI, determine if an FCOI exists and implement an interim management plan, if needed.

#### Management of Financial Conflicts of Interest

The Dean will perform a review of

Prior to the expenditure of funds, the College will provide a FCOI report to the PHS Awarding Component and ensure that a management plan is implemented. If a FCOI is obtained during the project or an Investigator new to the project has a FCOI, the College will provide a report to the PHS Awarding Component within 60 days of identification and ensure that a management plan is implemented.

x If the SFI report was not