

**A RESOLUTION TO AMEND THE POLICY ON CONFLICTS OF INTEREST AND
COMMITMENT (03/7)**

WHEREAS, federal requirements regarding conflicts of interest pertaining to federal research were first addressed by The George Washington University Policy on Conflict of Interest in Federally Funded Research (1995); and

WHEREAS, that policy was superseded by the Policy on Conflicts of Interest and Commitment (1998), whose scope included not only research conflicts of interest but other conflicts of interest and commitment and whose content, while designed to be responsive to federal research regulations, did not provide detailed information about federal regulations regarding conflicts of interest involving federally-funded research; and

WHEREAS, a Proactive Site Visit by an NIH team in August, 2003, designed to provide feedback on GW's compliance with Public Health Service (PHS) regulations revealed gaps and deficiencies in the current Policy on Conflicts of Interest and Commitment and processes surrounding it, and, most notably, indicated that the policy should be revised to clarify the meaning of "investigator" so that it includes more than faculty serving in principal investigator roles; state reporting requirements regarding conflicts of interest or problems arising from them; indicate that any subcontractors must be in compliance with our policy or their own institution's policy; state that records will be maintained for at least three years; and inform investigators, within the policy itself, of relevant federal regulation; and

WHEREAS, the University is also obligated to comply with National Science Foundation regulations in this area, and its investigators can benefit from awareness of other requirements and informational resources regarding conflict of interest;
NOW, THEREFORE

BE IT RESOLVED BY THE FACULTY SENATE OF THE GEORGE WASHINGTON UNIVERSITY:

That the Faculty Senate supports the proposed amendments to the Policy on Conflicts of Interest and Commitment to bring it into compliance with relevant federal regulations regarding conflict of interest in research.

Faculty Senate Committee on Research
January 9, 2004

Adopted February 13, 2004