

William Paterson University Policy

Functional Policy

SUBJECT:	Conflicts of Interest	TITLE:	SPONSORED PROJECTS AND RESEARCH CONFLICT OF INTEREST AND COMMITMENT DISCLOSURE POLICY		
CATEGORY: Check One	Board of Trustees <input type="checkbox"/>	University <input type="checkbox"/>	Functional <input checked="" type="checkbox"/>	School/Unit <input type="checkbox"/>	
Responsible Executive	Provost and Senior Vice President for Academic Affairs	Responsible Office:	Sponsored Programs		
CODING:	02-15-80-00-15	ADOPTED:	09/25/2018	AMENDED:	

I. Purpose:

William Paterson University (WP) embraces the ethical position that integrity, objectivity, honesty and the avoidance of self-dealing are essential elements in ethical conduct and critical for excellence as well as preservation of the public trust. **WP and its employees are committed to conducting themselves and their activities in accordance with the highest standards of integrity and ethics as defined by the State of New Jersey Uniform Ethics Code and the Plain Language Guide to New Jersey Executive Branch Ethical Standards.** The Sponsored Projects and Research Conflict of Interest and Commitment Disclosure Policy is specific to the conduct of any Federally sponsored project and is required since Federal requirements are not identical to the State of New Jersey's code, standards and guidelines.

This policy is specific to conflict of interest regulations for sponsored projects and research and is supplemental to the ethical obligations imposed by the State of New Jersey. These additional requirements are generally limited to Federal sponsors but could include any other government entity, a foundation, a corporation, another type of sponsor, and lead agency on a subaward. Therefore, all recipients of Federal awards and subawards are required to follow both the State of New Jersey Uniform Ethics Code and this policy.

II. Accountability

The Provost and Senior Vice President for Academic Affairs shall ensure compliance with this policy. The Office of Sponsored Programs (OSP) shall implement this policy, ensuring all faculty and staff to whom this policy applies abide by its terms and conditions. The OSP will develop and make available procedures to implement this policy. The OSP will post this policy, related procedures and forms on its website: www.wpunj.edu/osp as well as the University Policies website, <https://www.wpunj.edu/policies>.

III. Applicability and Effective Date

This policy applies to all University faculty and staff, collaborators, and contractors who are engaged in externally sponsored projects and all forms of research, including research involving human and animal subjects. WP will publish and promote this policy to University faculty, librarians, professional staff and senior administrators who may be engaged in or supervise externally sponsored projects or research activities.

This policy will go into effect on the first day of the fiscal year following its adoption.

IV. Definitions

Conflict of Interest: A potential or actual conflict of interest (COI) exists when a significant financial interest or commitment to an outside activity would reasonably appear to affect objectivity and independence of judgment. Federal agencies refer to all types of conflicts as a *Financial Conflict of Interest* or FCOI.

Significant financial interest (SFI): Anything of monetary value, including, but not limited to, remuneration in the form of salary or other payments for services (e.g., consulting fees or honoraria), equity interests (e.g., stocks, stock options, or other ownership interests), and intellectual property rights (e.g., patents, copyrights, and potential royalties from such rights). For this policy, a reportable significant financial interest is one that a key project leader has that could directly or significantly affect the design, conduct, or reporting of the project. A significant financial interest is not:

1. Salary, royalties or remuneration from the employing institution.
2. Income from seminars, lectures, or teaching engagements sponsored by public or non-profit entities.
3. Income from service or advisory committees or review panels for public or non-profit entities.
4. An equity interest that, when aggregated for the key project leader or their spouse and dependent children, meet both of the following tests: (a) does not exceed \$5,000 for NIH or \$10,000 for all other sponsors as determined through reference to public prices or other reasonable measure of fair market value AND (b) does not represent more than a 5 percent ownership interest in any single entity.
5. Salary, royalties, or other payments from any type of entity that, when aggregated for the key project leader or their spouse and dependent children, are not expected to exceed \$5,000 for NIH and \$10,000 for all other sponsors during the next 12 month period.

Significant commitment (SC): An outside activity or relationship (1) involves a perceptible reduction of the individual's time and energy devoted to WP activities, (2) involves the commitment and support of agencies, organizations or activities that affect the individual's time, energy and commitment to WP, (3) involves the pursuit of interests and/or activities that are in competition to or in conflict with WP's purpose, mission, policies and plans, or (4) constitutes a similar situation.

Federally Sponsored Project: Research or any other project funded by an agency or other organizational entity of the government of the United States of America, either directly, or via pass-through from another organization.

Key Project Leader: Includes the project director, principal investigator, or any other person, regardless of title or position, who is responsible for the design, conduct or reporting of sponsored project or research activity as well as the development and submission of a proposal to support such work. This may include non-WPU employees who are consultants, contractors, or collaborators representing themselves or agencies that will be or are partners in the sponsored project or research.

Member of the immediate family: This is a spouse, child, parent or sibling of a State employee, residing in the same household. This definition is codified in the New Jersey Uniform Ethics Code. N.J.S.A. 52:13D-13(i).

Sponsored project: An externally funded activity in which a formal written agreement based on a detailed statement of work and budget has detailed financial accountability and reporting requirements, has specific expectations or requirements concerning the disposition of deliverables at the end of the project, and is revocable if the terms of the award are not met. The term "sponsored projects" can include research, professional development, program and curriculum development, cultural and civic activities, construction and renovation projects, and other activities.

Research: Is broadly defined as an investigation or process that will establish facts, analyze information and reach conclusions that are shared with scholars, students or the public.

Ethics Liaison Officer: The individual appointed by William Paterson University to serve as the liaison to the State Ethics Commission and oversee the ethics program at the University.

Management Plan: The plan developed to manage an apparent or actual conflict of interest.

Project Oversight Officer: The individual from the key project leader's administrative hierarchy appointed to supervise the sponsored project during the Ethics Liaison Officer's review.

WP Sponsored Project and Research Conflict of Interest Disclosure Form: The form completed and submitted by the covered project leader to provide basic information on the possible conflict of interest or commitment.

V. References:

This policy has been developed in accordance with the provisions of:

- *New Jersey Conflict of Interest Law* (NJSA 52:13D-23), and the *New Jersey Institutional Code of Ethics Regulations* (NJAC 9A:3-1.1 et seq.), and the New Jersey Executive Commission on Ethical Standards (NJAC 19:61-1.1), and the *State of New Jersey Uniform Ethics Code* which governs and guides the conduct of State officers and employees.
- US Office of Management and Budget's *Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards*, (2 CFR 200.112: Conflict of Interest, (aka: Uniform Guidance)),
- US Department of Health and Human Service's policy on *Responsibility of Applicants for Promoting Objectivity in Research for which Public Health Service Funding is Sought and Responsible Prospective Contractors* (42 CFR Part 50 Subpart F; 45 CFR Part 94),
- National Science Foundation's *Conflict of Interest Policies* (NSF Award and Administration Guide, Chapter IV, Sec. A), and
- US Department of Education's Acquisition Regulation, (48 CFR 34.3403: Improper Business Practices and Personal Conflicts of Interest).

VI. Policy

It is the University's expectation that key project leaders (1) are familiar with and comply with all applicable sections of the *State of New Jersey Uniform Ethics Code*, (2) are familiar with and will comply with all applicable sections of the William Paterson University purchasing, travel and related financial management requirements, (3) complete training and submit all required forms to the WP Ethics Liaison Officer as required, and (4) are in compliance with any findings, directives and/or management plans that may exist.

Failure to comply with the *State of New Jersey Uniform Ethics Code* will negate compliance with this policy. The consequences related to failure to comply with the *State of New Jersey Uniform Ethics Code* will apply to this policy.

For *WP's key project leaders* who are engaged in the design, submission, conduct or reporting of sponsored projects and research, the University expects that (1) training will be completed and updated as needed prior to the submission of a proposal or the start-up of an award, and (2) disclosure documents are submitted as required.

For a *subrecipient's key project leaders* affiliated with an institution and engaged in the design, submission, conduct or reporting of sponsored projects and research submitted by or awarded to WP, it is expected that the subrecipient will act to fulfill the requirements stated in the subrecipient commitment form and the subaward agreement.

For *key project leaders who are not affiliated with an institution or whose institution does not have a conflict of interest policy*, it is expected they will have the same requirements for training and disclosure as WP's covered or key project leaders except that the Provost will determine if an actual conflict exists. The Office of Sponsored Programs will develop a management plan. Failure to adhere to a management agreement will result in the key project leader's removal from the project.

VII. Certification and Disclosure Requirements

A. The *WP Sponsored Project and Research Conflict of Interest Disclosure Form* (Appendix A) will be used to

collect information regarding potential conflicts of interest. The form will include (a) a cover sheet identifying the unique conflict of interest requirements covered by this policy, a certification statement and signature block, and an update and continuing use certification block, and (b) the WP Business & Personal Relationship Disclosure Form provided by the WP Ethics Liaison Officer.

B. *Certification at Time of Proposal Submission:*

1. The applicant will certify on the Project Approval Form (Appendix B) that:
 - a. He or she has provided the OSP with a completed and signed WP Sponsored Project and Research Conflict of Interest Disclosure Form during the current fiscal year, and
 - b. He or she is in compliance with any management plans that may exist as of the date of the Project Approval Form.
2. For each prospective subrecipient, certification will be documented by their responses and signature on the Subrecipient Commitment Form (Appendix C).
3. The OSP will certify that both of these requirements have been met when its representative signs the Project Approval Form.
4. The OSP may waive this requirement because of exigent circumstances to enable submission but all forms must be received within 14 days or the proposal can be withdrawn from review.

C. *Certification at Time of Award Set-Up:*

1. All key project leaders on the sponsored project will complete a new or certify the continuing accuracy of an existing WP Sponsored Project and Research Conflict of Interest Disclosure Form when the project is initiated or when they join the project.
2. The OSP may waive this requirement because of exigent circumstances to enable project set-up but all forms must be received within 14 days or the award activities and account can be suspended until the forms are received.
3. Subrecipient compliance will be documented in the subaward agreement.

D. *Maintenance of Certification During An Award:*

1. For multi-year awards, all WP key project leaders will complete a new or certify the continuing accuracy of an existing WP Sponsored Project and Research Conflict of Interest Disclosure Form annually.
2. Key project leaders will update their WP Sponsored Project and Research Conflict of Interest Disclosure Form within 30 days of a change related to anything included in the form.
3. The OSP may waive this requirement because of exigent circumstances to enable the continuation of the project but all forms must be received within 14 days or the award activities and account can be suspended until the forms are received.
4. Subrecipient institutions will certify their continuing compliance when the subaward agreement is renewed or modified.

E. *Availability of the Policy and Training:*

1. This policy will be posted on the Office of Sponsored Programs' webpage for WP key project leaders and anyone or any agency to access.
2. Training regarding this policy will be provided for WP key project leaders by the Office of Sponsored Programs. This training will not replace WP's ethics training requirements for any employee. Training must be completed prior to submission of disclosure forms and must be updated every five years. The OSP will maintain a log of who has completed training, when it was completed, and when it expires.

VIII. Disclosure Review, Record Keeping and Management

A. *Key Project Leaders who are WP employees:*

1. The Office of Sponsored Programs will review all WP Sponsored Project and Research Conflict of Interest Disclosure Forms it receives.
2. At time of proposal submission: If a potential conflict is identified, the OSP will work with the applicant

to manage or eliminate the conflict prior to proposal submission.

3. At time of award set-up: If a potential conflict is identified, the OSP will forward the completed WP Sponsored Project and Research Conflict of Interest Disclosure Form to WP's Ethics Liaison Officer for review and management. The Provost will appoint a Project Oversight Officer during the Ethics Liaison Officer's review to supervise activity related to the apparent conflict.
 - a) If the Ethics Liaison Officer determines there is not a conflict, she/he will notify the OSP.
 - b) If the Ethics Liaison Officer determines there is an actual conflict, then when the management plan is determined, he/she will provide a copy of the finding and management plan to the OSP. The OSP will work with the key project leader to modify the award as needed to implement the management plan. The OSP will report the conflict to the sponsor as required by the sponsor.
4. At time of annual update for multiyear awards: If a potential conflict is identified, the OSP will forward the completed WP Sponsored Project and Research Conflict of Interest Disclosure Form to WP's Ethics Liaison Officer for review and management. The Provost will appoint a Project Oversight Officer as needed during the review to supervise activity related to the apparent conflict.
 - a) If the Ethics Liaison Officer determines there is not a conflict, she/he will notify the OSP.
 - b) If the Ethics Liaison Officer determines there is an actual conflict, and after the management plan is determined, he/she will provide a copy of the finding and management plan to the OSP. The OSP will work with the key project leader to modify the award as needed to implement the management plan. The OSP will report the conflict to the sponsor as required by the sponsor.

B. *Key Project Leaders who ARE NOT WP employees and who are not covered by an institutional conflict of interest policy:*

1. The Office of Sponsored Programs will review all WP Sponsored Project and Research Conflict of Interest Disclosure Forms it receives.
2. At time of proposal submission: If a potential conflict is identified, the OSP will work with the applicant to manage or eliminate the conflict prior to proposal submission.
3. At time of award set-up: If a potential conflict is identified, the OSP will forward the completed WP Sponsored Project and Research Conflict of Interest Disclosure Form to the Provost to determine if there is an actual conflict. The Provost will appoint a Project Oversight Officer as needed during the review to supervise activity related to the apparent conflict.
 - a) If the Provost determines there is not a conflict, she/he will notify the OSP.
 - b) If the Provost determines there is an actual conflict, the OSP will work with the key project leaders to develop a management plan for review and approval by the Provost. The OSP will work with the key project leader to modify the award as needed to implement the management plan. The OSP will report the conflict to the sponsor as required by the sponsor.
4. At time of annual update for multiyear awards: If a potential conflict is identified, the OSP will forward the completed WP Sponsored Project and Research Conflict of Interest Disclosure Form to the Provost for determination if an actual conflict exists. The Provost will appoint a Project Oversight Officer as needed during the review to supervise activity related to the apparent conflict.
 - a) If the Provost determines there is not a conflict, she/he will notify the OSP.
 - b) If the Provost determines there is an actual conflict, the OSP will work with the key project leaders to develop a management plan for review and approval by the Provost. The OSP will work with the key project leader to modify the award as needed to implement the management plan. The OSP will report the conflict to the sponsor as required by the sponsor.

C. *Subrecipients:*

1. The subaward agreement will require the subrecipients to inform WP of actual conflicts and to provide a copy of the management plan.
2. The subaward agreement will require the subrecipient to provide an update on its monitoring efforts until the subaward is completed.

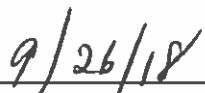
IX. Record Keeping and Reporting

- A. The OSP will maintain a database with sufficient information to track (1) the receipt of WP Sponsored Project and Research Conflict of Interest Disclosure Forms, (2) disclosure determinations, management plans and reporting requirements, (3) sponsor management plans and reporting requirements, and (4) monitoring of related outcomes.
- B. Disclosure forms and all other documentation used in the review of such statements, and records of institutional action taken pursuant to this policy will, to the extent permitted by law or the sponsor's regulations, be confidential and kept in a secure location separate from proposals and awards.
- C. Records will be maintained for (1) a period of at least three years, (2) a period of time needed for resolution of government action involving such records, or (3) a period of time fixed in the management plan, whichever is longer. Records will be destroyed following the applicable period.
- X. **Exhibits: Attached**
 - Appendix A – Sponsored Project and Research Conflict of Interest Disclosure Form
 - Appendix B – OSP Project Approval Sheet (current or subsequent)
 - Appendix C – OSP Subrecipient Commitment Form (current or subsequent)

By Direction of the President and Cabinet:



Acting Provost and Senior Vice President for Academic Affairs



Date

Appendix A

William Paterson University Sponsored Project and Research Conflict of Interest Disclosure Form

The Sponsored Projects and Research Conflict of Interest and Commitment Disclosure Policy (Policy) requires that all prospective and actual key project leaders have a current [WP Sponsored Project and Research Conflict of Interest Disclosure Form](#) (Form) on file with the OSP before a proposal may be submitted and during the entire period of an award.

The Policy and this Form are additional requirements for William Paterson University employees serving as key project leaders on externally sponsored projects or research sponsored. It does not replace or supersede requirements to complete other disclosure forms mandated by the State Ethics Commission and/or University policies, including but not limited to the Business & Personal Relationship Disclosure Form, Outside Activities Questionnaire Form, Travel Form, Scholarly Capacity Annual Disclosure Form, and Request for Approval for Attendance at Events. If you have any questions related to WP and State ethics requirements, please contact the University Ethics Liaison Officer (ELO), Ugonma Chukwunyere, 973-720-2954 or chukwunyere@wpuni.edu. Questions regarding this form and policy should be directed to the Office of Sponsored Programs, 973-720-2854 or grants@wpuni.edu.

The Policy seeks to identify potential or actual *Conflicts of Interest* that exist when a *Significant Financial Interest* or *Commitment* to an outside activity would reasonably appear to affect the objectivity and independence of judgment of a *Key Project Leader*. All financial interests must be disclosed for all Key Project Leaders and members of their immediate family. The NJ Commission on Ethical Standards will determine penalties for failure to disclose a conflict or abide by the plan developed to manage a conflict.

A reportable significant financial interest is one that a key project leader has that could directly or significantly affect the design, conduct, or reporting of the project. A significant financial interest is not: (1) salary, royalties or remuneration from WPU, (2) income from seminars, lectures, or teaching engagements sponsored by public or non-profit entities, (3) income from service or advisory committees or review panels for public or non-profit entities, (4) an equity interest that, when aggregated for the key project leader or their spouse and dependent children, meet both of the following tests: (a) does not exceed \$5,000 for NIH or \$10,000 for all other sponsors as determined through reference to public prices or other reasonable measure of fair market value AND (b) does not represent more than a 5 percent ownership interest in any single entity, or (5) salary, royalties, or other payments from any entity other than WPU that, when aggregated for the key project leader or their spouse and dependent children, are not expected to exceed \$5,000 for NIH and \$10,000 for all other sponsors during the next 22 month period.

Disclosure Form: To Completed by key project employee

Date Created or Updated	Initials	Date Created or Updated	Initials	Date Created or Updated	Initials
				<input type="checkbox"/> Second Sheet Attached	

Related Proposals and Awards: Completed by OSP

OSP #	Title (Abbreviated)	Sponsor (Abbreviated)	Proposal (Y/N)	Award (Y/N)	Related (Y/N)	OSP Review	OSP Initials
<input type="checkbox"/> Second Sheet Attached							

PERSONAL AND BUSINESS RELATIONSHIPS DISCLOSURE FORM

Appendix A

Instructions:

A State officer or employee, or special State officer or employee, of a State agency as defined in N.J.S.A 52:34-10.11 who is involved in the procurement process must complete this form in full. Involvement in the procurement process means drafting, reviewing, evaluating or making contract awards or substantively assisting in any of those tasks or authorizing payments under those contracts.

The completed form must be filed with the head of the State agency in which the State officer or employee, or special State officer or employee, holds office or employment. A copy of the completed form must be forwarded to the State Ethics Commission, PO Box 082, Trenton, NJ 08625-0082. (Hand delivery address: 28 West State Street, Room 1407, Trenton, NJ 08608).

The completed form must be reviewed by the filer on an annual basis. A new form must be completed any time there is a material change to any response.

A. General Information

Date of Statement

First Name:

M.I.

Last Name:

Business Mailing Address

Street Address:

P.O. Box:

City:

State:

Zip Code:

Daytime Telephone Number:

Email Address:

Position:

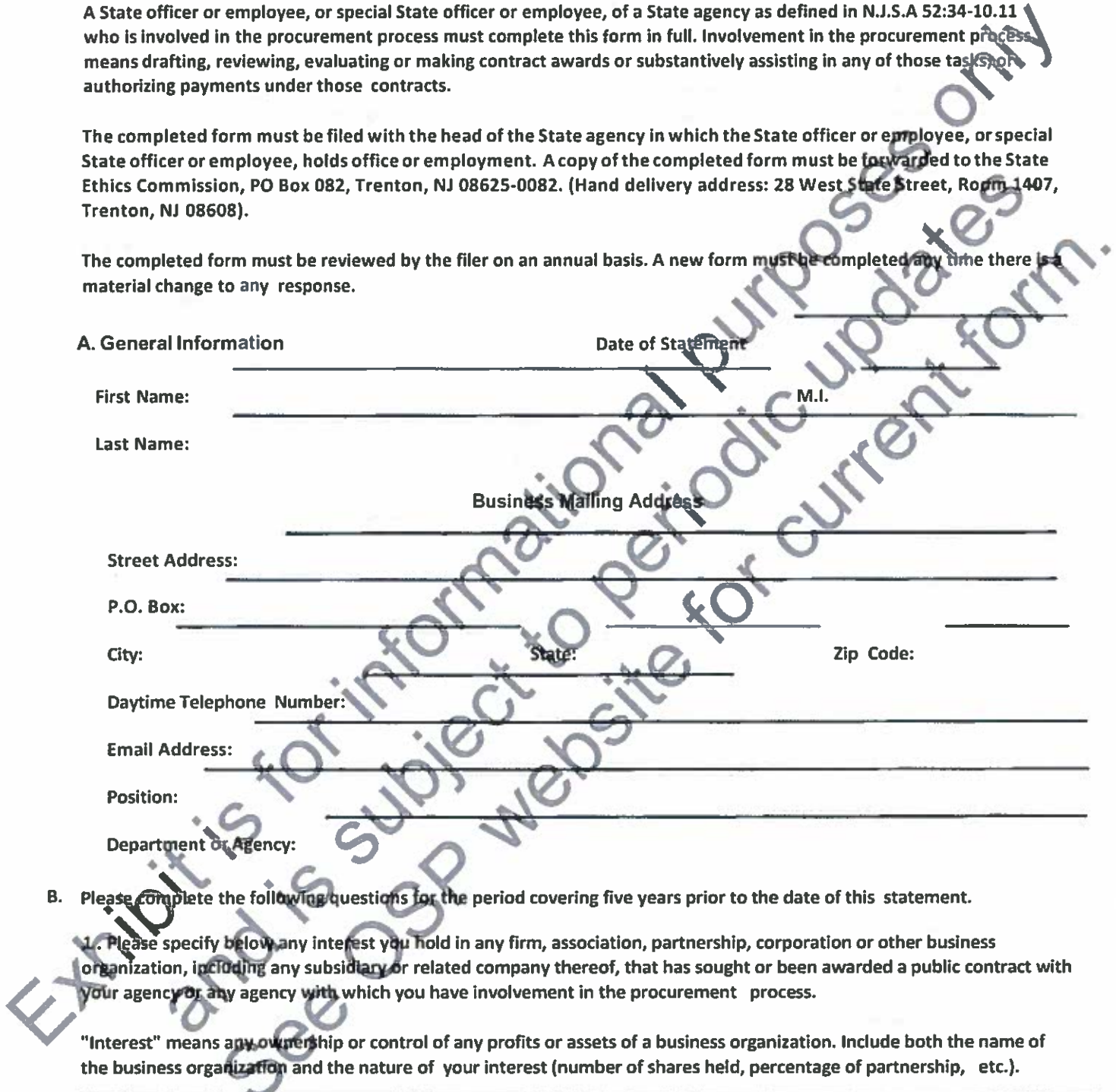
Department or Agency:

B. Please complete the following questions for the period covering five years prior to the date of this statement.

1. Please specify below any interest you hold in any firm, association, partnership, corporation or other business organization, including any subsidiary or related company thereof, that has sought or been awarded a public contract with your agency or any agency with which you have involvement in the procurement process.

"Interest" means any ownership or control of any profits or assets of a business organization. Include both the name of the business organization and the nature of your interest (number of shares held, percentage of partnership, etc.).

Multiple horizontal lines for providing details of business interests.



2. Please list below any professional relationship with any person, firm, association, partnership, corporation or other business organization, including any subsidiary or related company thereof, that has sought or been awarded a public contract with your agency or any agency with which you have involvement in the procurement process. Include both the name of the business organization and the nature of the professional relationship.

3. Please list below any personal relationship with any principal officer or director of any firm, association, partnership, corporation or other business organization, including any subsidiary or related company thereof, that has sought or been awarded a public contract with your agency or any agency with which you have involvement in the procurement process. Include the name of the principal officer or director, the name of the business organization and the nature of the personal relationship.

I certify that the information on this form, to the best of my knowledge and belief, is true, correct and accurate. I understand that I may be subject to discipline and/or prosecution if I have omitted or falsified information.

(Signature)

Date

Exhibit is for informational purposes only
and is subject to periodic updates.
See OSP website for current form.

Submit this form with a copy of the proposal narrative, budget and application guidelines to the OSP at least 5 business days before the deadline. SECTION E MUST BE SIGNED BY PD/PI.	OSP Control Number:	Date Received by OSP:
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SECTION A GENERAL INFORMATION

Project Director or Principal Investigator, Department and College/Unit	Submission Target Date:
Project Title	Type of Sponsor <input type="checkbox"/> Federal <input type="checkbox"/> State <input type="checkbox"/> Other Government <input type="checkbox"/> Grantmaking Public Charity <input type="checkbox"/> Professional Association <input type="checkbox"/> Foundation <input type="checkbox"/> Business <input type="checkbox"/> Other:
Sponsor and Title of Funding Opportunity	
Lead Agency if WPUNJ is Subrecipient	
Type of Submission: Please Check All That Apply <input type="checkbox"/> New <input type="checkbox"/> Grant <input type="checkbox"/> Contract <input type="checkbox"/> Subrecipient <input type="checkbox"/> Renewal <input type="checkbox"/> Supplement <input type="checkbox"/> Resubmission	Submission Method <input type="checkbox"/> Paper <input type="checkbox"/> Electronic <input type="checkbox"/> Combined <input type="checkbox"/> Other

SECTION B PARTICIPANT/PARTNER INFORMATION

1. If WPU Faculty/Staff from other departments/units are included in this project as key project staff, list each and obtain approval if in another College or Unit. Attach additional sheets if needed.

Name	Department	Approval	College/Unit	Approval

2. If there are partner agencies who will receive a subcontract, list each and attach Subrecipient Commitment Form. Identify in comments block and note if Form is attached.

Agency:	Agency:
<input type="checkbox"/> Subrecipient Commitment Form Attached	<input type="checkbox"/> Subrecipient Commitment Form Attached

SECTION C BUDGET

Project Dates: No. of Years: _____ Beginning Date: _____ Ending Date: _____

Direct Expenses Requested: \$	Indirect Expenses Requested: \$	Total Expenses Requested: \$
WPU Match or Cost Share Required? <input type="checkbox"/> No <input type="checkbox"/> Yes: Ratio or Percentage:		WPU Match / Cost Share: \$
Description of Cost Share/Match Expenses: <input type="checkbox"/> Reassigned Time <input type="checkbox"/> Travel <input type="checkbox"/> Supplies <input type="checkbox"/> Equipment <input type="checkbox"/> Computers/IT Support/Software/Licenses <input type="checkbox"/> Food <input type="checkbox"/> Other:		
Partner Agency Match or Cost Share Required: <input type="checkbox"/> No <input type="checkbox"/> Yes: Ratio or Percentage:	Special Expense Concerns Included in Project? <input type="checkbox"/> No <input type="checkbox"/> Yes: Explain on Reverse	

SECTION D SPECIAL REQUIREMENTS AND APPROVALS: Check all that apply, obtain signatures or attach approval. Attach additional sheets if needed.

<input type="checkbox"/> Human Subjects	<input type="checkbox"/> Additional Office	<input type="checkbox"/> Additional Lab	<input type="checkbox"/> Recombinant DNA	<input type="checkbox"/> Biohazard	
<input type="checkbox"/> Animal Subjects	<input type="checkbox"/> New Computer Lab	<input type="checkbox"/> Facility Renovation	<input type="checkbox"/> Radioactive Substance	<input type="checkbox"/> Controlled Substance	
Signature: _____		Date: _____		Signature: _____	
		Date: _____			

SECTION E CERTIFICATIONS AND FINAL APPROVAL SIGNATURES

Project Director's / Principal Investigator's Compliance Certifications:

1. I certify that the information contained in and attached to this proposal is true and accurate to the best of my knowledge.
2. WPU Sponsored Projects and Research Conflicts of Interest and Commitment Policy:
 - a. I certify that the every key project leader who was involved in the development and writing of this proposal has completed a William Paterson University Sponsored Projects and Research Conflict of Interest Disclosure Form unless their institution covers them. The key project leaders who are subject to WP's Sponsored Project and Research Conflict of Interest Policy include:

 - b. I certify that partner agencies have provided a Subrecipient Commitment Form and have indicated whether their institutional conflict of interest policy applies to this proposal and their employees or if they will be working under the William Paterson Sponsored Projects and Research Conflict of Interest and Commitment Disclosure Policy.
3. In accepting external funds, WPUNJ assures compliance with all Federal standards and policies specified in OMB Circulars and other regulatory directives regarding topics such as Misconduct, Conflict of Interest, Drug-Free Workplace, Protection of Human and Animal Subjects in Research, Lobbying Activities, and other issues mandated in the application materials. I certify that this application is in compliance with these policies and that I will comply with these policies in my role as Project Director or Principal Investigator when administering any grant or contract received in response to this application.

Project Director's Signature:

Date:

Approval for Submission:

I approve the submission of the attached proposal and budget, including the WP cost share. When award is made, there may be further discussions regarding the final approval and allocation of expenses included herein.

Department Chair or Director:	Signature	Date	<input type="checkbox"/> Comment
Dean/Associate Dean or Assistant/Associate Vice President:	Signature	Date	<input type="checkbox"/> Comment
Other: _____	Signature	Date	<input type="checkbox"/> Comment
Director, OSP:	Signature	Date	<input type="checkbox"/> Comment
Controller:	Signature	Date	<input type="checkbox"/> Comment
Vice President, Administration & Finance:	Signature	Date	<input type="checkbox"/> Comment
Associate Provost for Academic Affairs:	Signature	Date	<input type="checkbox"/> Comment
Provost & Senior Vice President for Academic Affairs:	Signature	Date	<input type="checkbox"/> Comment

Comments

Exhibit is for informational purposes only and is subject to periodic updates. See OSP website for current form.



Appendix C

William Paterson University
Office of Sponsored Programs
 Raubinger Hall 107, 973-720-2852

**Subrecipient Commitment
 Form**

Please complete this form, attach all required documents and certifications, and submit to William Paterson University by fax to 973-720-3573 or email to grants@wpunj.edu (please call to confirm receipt). This must be received by William Paterson University to authorize including you in the proposal when it is submitted.

Agency Legal Name			
Employer Identification Number (EIN):		DUNS Number:	
Principal Investigator or Project Director			
PI/PD Contact Information		Email Address:	
		Telephone:	
Proposal Title			
Funding Agency and Program			
Total Funds Requested	\$	Total Match or Cost-Share If Provided	\$
Performance Period:	Years	Beginning Date	Ending Date
Subrecipient is a	<input type="checkbox"/> Institution of Higher Education <input type="checkbox"/> Non-Profit Agency <input type="checkbox"/> Governmental Agency <input type="checkbox"/> Other: <input type="checkbox"/> Other Education (i.e.: K-12) <input type="checkbox"/> For-Profit Agency <input type="checkbox"/> Foreign Agency		
Required Attachments	<input type="checkbox"/> Statement of Work <input type="checkbox"/> Other: <input type="checkbox"/> Budget and Budget Justification <input type="checkbox"/> Other:		

CERTIFICATIONS

1. Facilities & Administration (F&A; Indirect)

- Rate included in the proposal/budget is either within our federally approved rate agreement, a reduced rate established by the funding agency that is within the scope of our rate agreement and that we accept, or is a non-federally reduced rate. Please provide the following:

Cognizant Agency, Contact and Phone: _____

Period Covered: _____

- We do not have a federally-approved rate; details on calculation are attached.

Not applicable for this proposal

2. Human or Animal Subjects or Not Applicable

- No Yes: Copy of local determination will be required for completion of subcontract agreement.

3. Conflict of Interest

We certify that we have an active and enforced conflict of interest policy that is consistent with the provisions of 42 CFR Par 50, Subpart F, *Responsibility of Applications for Promoting Objectivity in Research*.

We do not have an active and enforced conflict of interest policy and agree for our staff on this project to abide by WPUNJ's (www3.wpunj.edu/osp)

4. Cost Sharing/Matching/In-Kind

Included and described in full in proposal and budget

Not applicable for this project

5. Debarment or Suspension

We certify that this institution, its principals, or anyone involved in this project ARE ARE NOT debarred or suspended, proposed for debarment, declared ineligible, or voluntarily excluded from participation in any federal department or award.

6. A-133 Audit Status

We receive an annual audit in accordance with OMB Circular A-133.

We receive an annual audit based on other regulatory authorities.

APPROVAL

We certify that the information contained in the application and its budget are accurate and have been approved for submission. We certify that the programmatic and administrative personnel involved in the application are aware of agency policy in regard to subawards and are prepared to establish and implement the necessary inter-agency agreements consistent with those policies and the application that is submitted. We certify that we and this proposal are in compliance with the applicable OMB Circulars and other regulatory directives concerning Misconduct, Debarment and Suspension, Drug Free Workplace, and Lobbying, and other issues mandated in the application materials. We also understand that any work begun and/or expenses incurred prior to the execution of the subcontract agreement are at our own risk.

Authorized Official:

Name: _____

Signature: _____

Title: _____

Date: _____

Telephone: _____

Email: _____

Procedures for Managing the Sponsored Projects and Research Conflict of Interest and Commitment Disclosure Policy
September 2017

I. OSP provides training to prospective key project leaders who will be involved in developing and submitting proposals through the OSP. OSP maintains a database of individuals who have completed training and have a Disclosure on file.

II. All key project leaders involved in a proposal will complete or update a WP Sponsored Project and Research Conflict of Interest Disclosure Form (Disclosure) will do so at the earliest opportunity before the review of a proposal begins. OSP reviews Disclosures when they are received.

- A. If an apparent conflict exists in the planning stage, the OSP will work with the key project leaders to eliminate or reduce the conflict while the project is being developed.
- B. OSP updates database and files Disclosure.

III. When proposal is received for review:

- A. OSP checks Project Approval Form to see if a Disclosure was recently completed or updated.
 - 1. If yes, Disclosure is retrieved from file, proceed to B.
 - 2. If no, OSP checks file for current Disclosure. If a current Disclosure is available, proceed to B. If a current Disclosure is not available, OSP requests applicant to create a new Disclosure or update the Disclosure on file.
- B. OSP compares Disclosure against proposal to determine if there are any conflicts.
 - 1. If there is not an apparent conflict, OSP updates form and database and files Disclosure.
 - 2. If there is an apparent conflict, (a) OSP works with applicant to eliminate or minimize conflict in the proposal, (b) updates Disclosure and attaches management plan, and (c) updates form and database and files Disclosure.

IV. When an award is received and management of conflicts:

- A. All key project leaders create or update Disclosures prior to project start-up. Any key project leaders who have not completed training will do so before completing form and before project start-up.
- B. OSP compares Disclosure against proposal and award to determine if there are any apparent conflicts.
 - 1. If there are no apparent conflicts, OSP updates form and database and files Disclosures.
 - 2. If there is an apparent conflict, the OSP
 - (a) Sends the Disclosure to the WP Ethics Liaison Officer for review, determination and action as needed. The WP Ethics Liaison Officer informs OSP of outcome and, when created and finalized, provides a copy of the management plan. Provost appoints a Project Oversight Officer to supervise project activities during the Ethics Liaison Officer's review.
 - (b) OSP reviews plan against proposal and sponsor requirements, works with project director and other key project leaders to modify the project plan and budget as needed, and informs the sponsor according to the sponsor's requirements.
 - (c) OSP updates form and database and files Disclosures.

V. For Multi-Year Awards

- A. Key project leaders update or create new Disclosures prior to the anniversary for the award.
- B. Key project leaders update or create new Disclosures within 30 days of a change to the information in their Disclosure.
- C. Disclosures are reviewed and managed as per process in IV.