

I. Introduction

In an effort to ensure that MSU manages or eliminates Financial Conflicts of Interest, the guiding principles outlined below will inform the CIRC's approach to identifying and addressing Financial Conflicts of Interest. The application of these guiding principles defines various actions or activities that either are not permitted or require prior approval.

II. Definitions

Related Entity – any for-profit or non-profit entity in which the Investigator, alone or in combination with his or her Family, holds a Significant Financial Interest.

Family – the Investigator's spouse and dependent children.

III. Procedures

Guiding Principles include:

1. An Investigator's first and primary responsibility is to support and advance MSU's mission, rather than to advance his or her personal financial interests.
2. Research must be undertaken to advance scholarship and new knowledge and not an Investigator's or the Investigator's Family's personal financial interests.
3. Financial Conflicts of Interest must be identified and either managed or eliminated.
4. Disclosure of Significant Financial Interests and professional activities related to but outside the Investigator's Institutional Responsibilities is integral to identification of Financial Conflicts of Interest.
5. An Investigator must not attempt to influence the activities of colleagues and subordinates with the intent of enhancing the Investigator's or the Investigator's Family's financial interests.
6. Research results must not be withheld or provided on a preferential basis for the benefit of an Investigator's or the Investigator's Family's financial interests.
7. MSU's resources, names and trademarks may not be used for personal benefit.
8. Investigators must disclose any actual Financial Conflicts of Interests and any Significant Financial Interests that may appear to give rise to a Financial Conflict of Interest to students and staff who participate in their research.
9. Extra scrutiny must be given to potential Financial Conflicts of Interest in research involving human subjects.
10. An Investigator may not supervise directly or indirectly any member of his or her Family nor may an Investigator assume the role of advocate or judge regarding a Family member's employment, salary, or promotion.

The application of these Guiding Principles requires that Investigators may not:

1. Accept research sponsorship or gifts, in support of the Investigator's Institutional Responsibilities from a for-profit privately-held Related Entity;

2. Subcontract to a for-profit privately-held Related Entity are typically not permitted, but may be approved on a case-by-case basis (see statement below regarding purchasing goods and services from a Related Entity);
3. Negotiate with MSU on behalf of a Related Entity, or negotiate with the Related Entity on behalf of MSU;
4. Involve a student for whom the Investigator is a thesis supervisor in the Investigator's professional activities outside his/her Institutional Responsibilities;
5. Divert research opportunities to a Related Entity, which are more appropriately undertaken at MSU, such as research sponsorship or other projects;
6. Promote the use of products or services of a Related Entity in the course of the Investigator's Institutional Responsibilities; or
7. Engage in research involving human subjects that could reasonably be expected to affect the financial condition of a Related Entity.

The application of these Guiding Principles requires that the Investigator obtain prior written approval of the Investigator's Department Head/Director, and in appropriate cases, enter into a management plan, before the Investigator:

1. Accepts research sponsorship or gifts, in support of the Investigator's Institutional Responsibilities from a publicly-held or non-profit Related Entity;
2. Accepts an in-kind gift from a publically-held or non-profit Related Entity for use in his or her Institutional Responsibilities;
3. Accepts research sponsorship from a Related Entity from which the Investigator receives remuneration (for example, it may be permissible for an Investigator to receive research sponsorship from a Related Entity for whom the Investigator consults if the Department Head/Director determines that the consulting scope of work and the research scope of work are separate and distinct);
4. Purchases goods or services from a Related Entity (for example, the Department Head, in collaboration with Procurement & Contracts, could determine that the goods and services are not commercially available from another provider);
5. Provides goods, services, or access to facilities to a Related Entity (for example, MSU may determine to make certain unique facilities available for use by outside entities, in which case a Related Entity could be entitled to use the facilities on the same basis as other entities);
6. Involves a student for whom the Investigator is not a thesis supervisor in professional activities outside his/her Institutional Responsibilities, as an employee or consultant or in any other capacity (such involvement may be beneficial for the student, but the student's educational experience must not be diminished or diverted);
7. Involves staff in the Investigator's Related Entity's activities.
8. Requests an appointment for an individual from a Related Entity to participate in research at MSU.

Conflict of Interest Review Committee Chair

Date