

The Connecticut Agricultural Research Station

Policy on Financial Conflict of Interest in Research

Approved 1/29/2026

Purpose

This policy provides guidelines to ensure that federally funded research at The Connecticut Agricultural Experiment Station (CAES) is not biased by financial interest of scientists, and to ensure that all research projects are in compliance with federal regulations. Concurrent with this policy, CAES employees are trained in and bound by the statutory Code of Ethics of the parent organization, the State of Connecticut, which strictly prohibit gifts, honoraria, fees, or any other personal financial benefit deriving from official duties; restricts outside employment; and requires prompt disclosure and documentation of expense reimbursements for sponsored travel. This policy is written to focus on federal conflict of interest regulations that are not explicitly covered by the CT Code of Ethics. The purpose of this policy is not to discourage appropriate outside collaborations, but to ensure that they adhere to the highest ethical standards.

Background and Definitions

1. CAES scientists are encouraged to apply for federally funded research, to form collaborations with public and private entities, and to establish intellectual property rights on critical inventions. All of these activities contribute to the CAES missions of public service and scientific advancement.
2. As State Employees, CAES staff must comply with the State Code of Ethics found in Connecticut General Statutes Section 1-81. These statutes include, but are not limited to:
 - a. Definition of conflict of interest: “A...state employee has a substantial conflict and may not take official action if any expected benefit or detriment accrues solely to the individual, his or her spouse, dependent child, or a business with which he or she is associated.”
 - b. Prohibition of employees and immediate family members accepting gifts worth \$10 or greater from any entity that is regulated by or does business with CAES.
 - c. Prohibition on accepting any honoraria or consulting fees for any official duties.

- d. Prohibition on any after-hours employment with entities that have business with the agency, or could otherwise reasonably appear to interfere with professional judgement.
 - e. Requirement for disclosure and documentation of necessary expenses reimbursement accepted by state employees.
- 3. CAES employees must also comply with agency intellectual property rules, which require employees to work with the agency administration and the ethics officer in submitting patent applications for inventions developed at CAES. Policy requires all remuneration or royalties derived from intellectual property to be administered and distributed by CAES.
- 4. In addition to State requirements, federal regulations of sponsors including the Public Health Service, USDA, Department of Energy, National Science Foundation, and Food and Drug Administration require:
 - a. Disclosures of significant financial interests by all investigators (defined as PI, Co-PI, or any person responsible for design, conduct, or reporting of research activities), and their immediate families (defined as spouse or domestic partner and dependent children).
 - b. Institutional certification that all proposed and ongoing sponsored research is either free of financial conflicts of interest, or that such conflicts are managed, reduced or eliminated, and reported as required by applicable regulations;
 - c. The implementation of an institutional mechanism for managing financial conflicts of interest in research;
 - d. Notification of sponsors, as required, of management plans and any problems that arise with conflict management;
 - e. Monitoring of compliance, procedures for retroactive review in cases of non-compliance, enforcement mechanisms, and sanctions where appropriate;
 - f. Maintenance of records relating to this policy; and,
 - g. Providing information and training to Investigators, as required by applicable regulations.
- 5. **Significant financial interests** not covered by the State Ethics Statutes are defined as:
 - a. When an investigator has an equity interest of \$5,000 or more over the past 12 months or which is expected to exceed \$5,000 over the next 12 months in any single entity. (Equity interest may include stock, stock options, ownership, or

- partnership, but does not include mutual funds or other investment accounts where the Investigator does not make investment decisions).
- b. When an investigator has an equity interest of 5% or more ownership in any single entity
 - c. When an investigator or immediate family has received more than \$5,000 or more in salary, royalties, or other payments. This does not include income from teaching engagements at institutions of higher education, or income from government agencies.
 - d. A company licensing any Investigator intellectual property not owned by CAES.
6. ***A financial conflict of interest (FCOI)*** in research exists when an investigator's significant financial interest or that of their immediate family could bias, or reasonably appear to bias, their professional judgement in design, conduct, or reporting of research.
7. ***Investigator-*** For the purposes of this policy, CAES defines an investigator as 1) anyone who is Primary Investigator (PI), Project Director (PD) or Co-PI/PD of ongoing or proposed sponsored research, and 2) staff members of any title who share control in the design, execution, or reporting of sponsored research (i.e., plan and perform experiments independently of PI review and approval).

Procedures

1. ***Notification and Training:*** All CAES employees must be trained in the State Code of Ethics through the "Online Course on the Code of Ethics for Public Officials and State Employees" provided by the Office of State Ethics. This training is taken within the first six months of their CAES employment, and every five years afterwards. Project Directors and other employees who are responsible for the design, conduct, or reporting of federally sponsored research must also complete the FCOI tutorial provided by the National Institutes of Health Office of Extramural Research and provide a completion certificate before their first proposal submission, and every four years after. This policy will be e-mailed to CAES investigators, posted on the institutional website, in the employee manual, and linked from the financial interest disclosure form.
2. ***Disclosure of Significant Financial Interests:***
 - a. At least once every 12 months, investigators must submit an online disclosure form listing all significant financial interests held by themselves and immediate

family that 1) could reasonably appear to be related to any of the investigator's research areas or CAES job duties, or 2) that pertain to foreign entities. If there is no such financial interest, the investigator may check a box indicating this. The Responsible Officer will not submit any proposal until the disclosure and training certification has been submitted.

- b. Investigators must also use the form to report relevant or foreign financial interests within 30 days of the date a new significant financial interest is acquired or discovered.
- c. **For grants including subrecipients**, subrecipient investigators will be required to confirm that their institution has an FCOI policy compliant with federal regulations and funding agency requirements, to confirm that they will comply with their institution's policy, and to provide the link to their policy, prior to being awarded the subcontract. If they do not have an FCOI policy, they must agree in writing to comply with the CAES policy and make disclosures to CAES.

3. *Determination and management of a Conflict of Interest:*

- a. When a new award notification is received, the Fiscal Office will inform the Research Integrity Officer (RIO). The RIO will review the corresponding Financial Interest Disclosure Form and relevant funding agency policies to determine whether a FCOI exists relevant to that award, and if so, to recommend a management plan to manage or eliminate the conflict. Imposed conditions may include public disclosure on all project communications, appointment of an external monitor, modification of the research plan, or divestiture of the financial interests.
- b. The RIO will notify the investigator and department chair of the management plan in writing, and the investigator will indicate agreement in writing. The RIO will maintain records of this interaction and inform appropriate fiscal officers on any restrictions on spending. If the investigator does not agree, they may appeal to the Station Director in writing. If the Director has a conflict, he or she may appoint a member of the Board of Control or a qualified independent reviewer to make a decision on whether to amend or change the management plan. Where an FCOI exists, Investigator will not access award funds until a management plan is agreed upon.

- c. When a new relevant financial interest is reported during the course of an ongoing sponsored project, either due to addition of a new investigator or emergence of a new SFI for existing investigators, the RIO will determine whether an FCOI exists and recommend a management plan within 60 days of the report.
- d. The RIO will maintain all FCOI disclosures, management plans, and related records for a minimum of 3 years following the financial closeout of all related sponsored research projects. FCOI files will be shared with the CAES Ethics Officer as a backup curator.

Monitoring compliance

- a. The Chief Fiscal Officer and Director are the AROs responsible for checking disclosure prior to grant submission. The Investigator's Department Chair will monitor compliance with the management plan, asking for updates at once per year or more during annual performance reviews.
- b. If an Investigator does not report an FCOI in a timely manner, or if the investigator does not adhere to a management plan, the Department Chair will notify the RIO and the Director. The RIO will gather facts to determine whether the investigator failed to meet disclosure or management requirements, and whether this failure was knowing or intentional. If so, the RIO and Director will perform a retrospective review. The RIO may appoint an *ad hoc* committee of impartial subject matter experts to assist in this review. The reviewers will examine the research record and gather other necessary evidence to determine whether the research conducted during the period of noncompliance was affected by bias, or flawed study design or procedures that favor one outcome over another. If misconduct is discovered during the review, this will trigger a misconduct investigation pursuant to agency policy. The RIO will compile a written report detailing the conflict, the review methods, analysis of the Investigator's explanation, and findings and conclusions, and notify the Investigator and Director. The Director will report the findings to the relevant agency, and if bias is discovered, establish a mitigation plan to correct the research record and implement any measures necessary to ensure compliance in the mitigation plan. Retrospective review and its outcomes will be completed and documented within 120 days of discovery of the FCOI.

- c. Based on reporting from the RIO, the Director will comply with specific agency reporting requirements to promptly notify funding agencies when an FCOI and management plan exists, when noncompliance is discovered, and when noncompliance is found to have resulted in research bias.

Implementation and Enforcement

The CAES Director is responsible for overseeing the implementation of this Policy. The Director has delegated the disclosure and review process to the Vice Director, who also serves as the Research Integrity Officer (RIO). The RIO, in consultation with the Director and the Investigator(s) Department Head, will lead review of all breaches of the policy, including knowing or negligent failure to report conflicts, failure or refusal to comply with a management plan, or failure to remedy conflicts.

When a financial interest is reported involving a project or entity in which the Director has a potential conflict of interest, the RIO will appoint a member of the CAES Board of Control or other impartial external reviewer to determine whether an FCOI exists and determine a management plan. Similarly the Director will appoint an external reviewer when the RIO has a conflict of interest.

Penalties for those who knowingly and willingly disregard this policy will be determined by the Director in consultation with the RIO and the investigators' Department Head(s), and under the guidance of the Office of Labor Relations. Sanctions may include, but are not restricted to, formal reprimand, notification of professional journals and funding agencies, unfavorable performance reviews, termination of grant support, adjustment of research resource allocation, suspension, or dismissal.