



CONFLICT OF INTEREST POLICY

This policy is applicable to each member of the **Board of Directors**, employees designated as **Executive Staff** and those who are **Investigators** on sponsored programs or directly responsible for programmatic and other funding decisions. Any EcoHealth Alliance Board Member, Executive Staff member, or Investigator who has, or whose immediate family has, a *Substantial Financial Interest* in any contract with, sale to, purchase from, service for, or decision by EcoHealth Alliance must complete the Conflict of Interest (COI) Form found on page 2. Investigators are subject to the PHS regulations regarding *Significant Financial Interests* and are required to complete an additional certification, found on page 3. All disclosures will be kept confidential and sent to EcoHealth Alliance's Conflict of Interest Committee.

An annual survey of Conflict of Interest disclosures is a requirement of the Internal Revenue Service for completing Form 990 and is required by the US Code of Federal Regulations. EcoHealth Alliance's Conflict of Interest Policy is designed to ensure to the public that EcoHealth Alliance is managed with the highest levels of integrity, transparency, and accountability.

All Board Members and Executive Staff are required to annually review the applicable section of EcoHealth Alliance's bylaws regarding Conflicts of Interest and to certify in writing to the following:

- Each member of EcoHealth Alliance's **Board of Directors and Executive Staff** shall complete a Conflict of Interest Form (see page 2) identifying any relationships, positions, or circumstances they are party to that qualify as a *Substantial Financial Interest*, which may include but is not limited to service as a director of or consultant to another nonprofit organization, related party transactions as defined New York State legislation, or ownership of a business that might provide goods or services to EcoHealth Alliance.
- All members of staff who are **Investigators** on programs or otherwise directly responsible for programmatic and other funding decisions shall complete a Conflict of Interest Form (see page 2) and an additional certification stating that their Substantial Financial Interest disclosures meet the qualifications listed above as well as the PHS standards for Significant Financial Interests (see page 3).
- Any individual responsible for submitting a Conflict of Interest Form should also include any other types of conflicts that may exist even if there is no financial interest at stake or the circumstances are otherwise outside the definition of a related party transaction.

All disclosures made by a Board member, or Executive Staff or those who are Investigators on sponsored projects or directly responsible for programmatic and other funding decisions, shall be treated as confidential and shall be made available only to the Board Chair, the President, and EcoHealth Alliance's Conflict of Interest Committee, except to the extent additional disclosure is necessary in connection with the implementation of this Policy.

Board members and Executive Staff or those who are Investigators on programs or directly responsible for programmatic and other funding decisions who do not have any Substantial or Significant Financial Interests are required to inform the Conflict of Interest Committee of any change in circumstances that may result in a Conflict of Interest within thirty (30) days of the discovery of such change.

EcoHealth Alliance's COI Committee will review all disclosures to determine whether a Substantial Financial Interest reasonably appears to directly and significantly affect any contract with, sale to, purchase from, service for, or decision by EcoHealth Alliance and constitutes a Conflict of Interest. Any individual who has submitted a COI form who is also appointed to the COI Committee shall recuse themselves upon review of their own disclosures. If the COI Committee determines a Conflict of Interest exists for any individual, the President of EcoHealth Alliance shall be advised. If the President acting as a Principal Investigator or otherwise is deemed to have a Conflict of Interest, the Board Chair will be notified. Any individual determined to have a conflict of interest is prohibited from any attempt to improperly influence the deliberation or voting on the matter giving rise to such conflict. EcoHealth Alliance will work with the party reported or deemed to have a Conflict of Interest to develop a corrective action plan that will manage, reduce, or eliminate the conflict. The plan will be in writing and signed by the party and the President or designee.

All Conflict of Interest disclosures, as well as documentation of the determined existence and subsequent resolution of any Conflict of Interest including but not limited to minutes of any meeting at which the conflict was discussed or voted upon shall be retained by EcoHealth Alliance indefinitely but for five years at minimum.



CONFLICT OF INTEREST POLICY DISCLOSURE FORM

Please complete and return this form to the appropriate email listed.

Check all that apply:

- Board Member _____ (Return to boardcoi@ecohealthalliance.org)
- Executive Staff _____ (Return to coi@ecohealthalliance.org)
- Investigator _____ (Return to coi@ecohealthalliance.org)

If **Investigator** is selected, the COI for Research certification form is also required.

Check one of the following:

- I have no substantial financial interest(s) to report _____
- I have the following substantial financial interest(s) to report _____

If you have indicated that you have a substantial financial interest to report, specify this interest below, including for example: other nonprofit and for-profit boards that you and/or your immediate family sit on, any for-profit businesses for which you or an immediate family member are an officer or director, or a majority shareholder, and/or the name of your employer and any businesses you or an immediate family member own that would appear to conflict with board activity or other activity that affects a decision made by EcoHealth Alliance. **Investigators are also required to disclose significant financial interests that meet the PHS standards (described on page 3).** Describe any relationships, transactions, positions you hold (volunteer or otherwise), or circumstances that you believe may contribute to a Conflict of Interest between EcoHealth Alliance and the personal financial or other interests of you and/or your immediate family member.

If completing as an Investigator on any sponsored research activity, also complete the Conflict of Interest Certification for Research on the following page.

1. _____
2. _____
3. _____
4. _____
5. _____

Attach additional pages if more space is needed to list or detail substantial or significant financial interests.

By signing below, I certify that the information set forth herein is true and complete to the best of my knowledge. I have read, reviewed, and agree to abide by EcoHealth Alliance’s Conflict of Interest Policy. I also understand that I am responsible to notify EcoHealth Alliance’s Conflict of Interest Committee of any Conflict of Interest that may arise, or cease to exist, during my tenure as a Board Member, member of Executive Staff, or Investigator.

Signature: _____

Date: _____

Full Name: _____



CONFLICT OF INTEREST CERTIFICATION FOR RESEARCH

This form is **only for Investigators** who are EcoHealth Alliance personnel or who are acting as an investigator on behalf of EcoHealth Alliance and who are directly responsible for programmatic and other funding decisions, and are required to disclose all circumstances that may in fact be, or may appear to be, a domestic or foreign Significant Financial Interest regardless of whether that Significant Financial Interest is related to the sponsored project.

An **EcoHealth Alliance Investigator** is hereby defined, regardless of title or position, who is chiefly and primarily responsible for the design, conduct or reporting of one or more sponsored research projects which includes all senior/key personnel on federally sponsored projects. This policy will also apply to subrecipient Investigators who elect to adhere to EcoHealth Alliance’s Conflict of Interest Policy in the absence of their own institutional Conflict of Interest policy that meets or exceeds US federal regulations and any applicable funder standards.

This form is required to be submitted by all relevant EcoHealth Alliance Investigators before submitting a proposal for a sponsored award and then, if awarded, annually at minimum. Significant Financial Interests that must be disclosed include, but are not limited to, the following:

1. Income for services (e.g., consulting fees or honoraria that exceeds \$5,000 per year).
2. Equity interests (e.g., stock, stock options, or other ownership interests) with a fair market value greater than \$5,000, but not including equity interests in mutual funds.
3. Intellectual property rights and interests (e.g., receipt of royalty payments), upon receipt of income related to such rights and interests.
4. Fiduciary role (e.g., Board of Directors member, officer or manager).
5. For the purposes of this policy, Significant Financial Interest shall also include all resources made available to a researcher in support of and/or related to their research endeavors, regardless of whether they have monetary value and whether they are based at the researcher’s institution. This includes affiliations and appointments, all financial and other resources that support their research (including in-kind support), and any current or pending participation in programs sponsored by foreign governments. If these resources and relationships have already been documented with EcoHealth Alliance as part of a proposal process and have not since changed, they are already kept on file and do not need to be disclosed on the above Conflict of Interest form.

The following circumstances are not subject to disclosure:

1. Salaries, royalties, or other remuneration paid by EcoHealth Alliance to the employee if s/he is currently employed by EcoHealth Alliance.
2. Income from investment, such as mutual funds and retirement accounts, so long as the employee has no direct control over investment decisions of these accounts.
3. Income from service on advisory committees or review panels or seminars, lectures, or teaching engagements sponsored by a federal, state, or local government agency, an institution of higher education as defined in US CFR; an academic teaching hospital, a medical center, or research institute affiliated with an institution of higher education.

If EcoHealth Alliance determines that a Significant Financial Interest reasonably appears to directly and significantly affect the design, conduct or reporting of the sponsored research activity and constitutes a Conflict of Interest, the President of EcoHealth Alliance shall be advised. If the President acting as a Principal Investigator or otherwise is deemed to have a Conflict of Interest, the Board Chair will be notified. EcoHealth Alliance will work with the Investigator reported or deemed to have a Conflict of Interest to develop a corrective action plan that will manage, reduce, or eliminate the conflict. The plan will be in writing and signed by the Investigator and the President or designee. In accordance with federal regulations, any plan put into place to manage an identified Conflict of Interest will be monitored for compliance until the completion of the sponsored project. If the Conflict of Interest may not be resolved prior to the award of a grant, EcoHealth Alliance shall not accept the award. Under no circumstances may any federal funds be spent prior to the agreement and implementation of a corrective action plan. Should the Investigator fail to comply with terms of the corrective action plan, s/he shall be subject to appropriate disciplinary procedures.

In addition to the disclosure of any significant financial interest(s), in accordance with federal regulations Investigators on sponsored projects are required to complete the online CITI FCOI training before submitting any proposal or application, and subsequently at least every four years. The training is also required if Institutional FCOI policies change in a manner that affects Investigator requirements, an Investigator is new to EcoHealth Alliance, or if EcoHealth Alliance finds evidence of noncompliance with the Conflict of Interest policy or any corrective plan.

I certify that this is a complete disclosure of all Significant Financial Interests to EcoHealth Alliance. I understand that this form shall be retained by EcoHealth indefinitely but at minimum for three years after the end of the grant award or the rejection of the proposal by the funding organization. I agree to update this disclosure within thirty (30) days of any event that would create a Significant Financial Interest.

Signature _____

Date _____