



FSU Research Compliance Programs Financial Conflict of Interest (FCOI) in Research Quick Reference Guide

Who must disclose?	<ul style="list-style-type: none"> All investigators submitting proposals to or receiving an award from the National Science Foundation, Public Health Service (including NIH), or any other entity adopting PHS FCOI regulations, must submit a disclosure when certain conditions are met. A list of agencies which have adopted PHS regulations can be found at http://nrc59.nas.edu/pub/fcoi_agencies_phs_regs.html.
Who is an investigator?	<ul style="list-style-type: none"> The Project Director or Principal Investigator and any other person, regardless of title or position, who is independently responsible for the design, conduct, or reporting of funded research or research proposed for funding. A rule of thumb to determine if an individual should be considered an “investigator” is if they will likely be included as an author for any publications resulting in the research. Examples of investigators include: <ul style="list-style-type: none"> Key personnel identified in the grant application, progress report, or other report submitted to the funding agency. Personnel likely to be included as an author of reports and/or scientific journal submissions. Collaborator/consultants/contractor/subcontractor/sub-recipient that are responsible for design, conduct or reporting of the research. External advisory committee members for specific grants if they are responsible for design, conduct or reporting of the research. Graduate students and post-doctoral associates who are responsible for design, conduct or reporting of the
What must be disclosed?	<ul style="list-style-type: none"> For NSF: Only those significant financial interests (SFI) of the Investigator (and those of his/her spouse and dependent children) that: <ul style="list-style-type: none"> Meet NSF’s definition of SFI; Are related to your institutional responsibilities; and Would reasonably appear to be affected by the research or educational activities funded or proposed for funding by NSF; or in entities whose financial interests would reasonably appear to be affected by such activities. For PHS (and any other entity adopting PHS FCOI regulations): All significant financial interests (SFI) of the Investigator (and those of his/her spouse and dependent children) that: <ul style="list-style-type: none"> Meet PHS’s definition of SFI; Are related to your institutional responsibilities. See the FSU’s Conflict of Interest Policies for NSF and PHS for more information.
When do I disclose?	<ul style="list-style-type: none"> Prior to submission of a proposal for funding. Reviewed and updated (if necessary) prior to spending on an award. Annually (for PHS funded awards only) As new SFI’s are identified (including reimbursed travel for PHS awards only).
How do I disclose?	<ul style="list-style-type: none"> For NSF: Complete the <i>Significant Financial Interest Disclosure Form for NSF-Related Research</i>. For PHS: Disclosures should be submitted through FSU’s <i>Electronic Disclosure Management System (EDMS)</i>. Subrecipients/Subcontractors whose organizations have their own disclosure policy may submit disclosures in accordance with their policy.
Who will see my information?	<ul style="list-style-type: none"> Staff in the Office of Research Compliance Program will review all disclosures. Disclosures indicating there may be a financial conflict of interest may be shared with the Vice President for Research, a Conflict of Interest Management Committee, legal counsel, the Investigator’s department head, or other relevant individuals and administrative offices or units. If it is determined that a financial conflict of interest (FCOI) exists on a PHS funded award, FSU is required to provide certain information to the PHS funding agency. If it is determined that a FCOI exists on a PHS funded award, FSU is required to make certain information available to the public, upon request. If it is determined that a FCOI exists on an NSF funded award and the conflict cannot be managed, FSU is required to report this to NSF.
How is it determined if an SFI is a FCOI?	<ul style="list-style-type: none"> An FCOI exists if FSU’s Institutional Official (IO)—the Director of Research Compliance Programs—in consultation with other stakeholders as needed, reasonably determines that the SFI related to the proposed research could directly and significantly affect the design, conduct or reporting of the proposed research.
What if I have an FCOI?	<ul style="list-style-type: none"> FCOI’s must be managed, reduced or eliminated. Management plans are often used to manage risk of bias in research and allow the research to be conducted. Following identification of a SFI, the CIMC will review and approve of a management plan or determine the FCOI is not manageable.