

Overview of UWL Financial Conflict of Interest (FCOI) Policy

Which projects are subject to the FCOI policy?

The UWL FCOI policy¹ applies to all proposals to and awards from all federal agencies, including subawards and projects supported by federal flow-through funding. The policy also applies to non-federal agencies with FCOI requirements and research contracts with non-federal entities. The FCOI policy applies to all types of extramural funding, including but not limited to grants, cooperative agreements, and research contracts.

Which people are subject to the policy?

The policy applies to anyone who qualifies as a project investigator – i.e., *any* individual responsible for the design, conduct, or reporting of research. This always includes all PIs/PDs, co-investigators, and senior/key personnel from all participating institutions. It may also include graduate students, undergraduate students, and other collaborators².

If a project involves external collaborators who qualify as investigators, they are also subject to FCOI requirements at UWL and their home institution. Before a proposal can be submitted, these requirements include, at minimum, the completion of an FCOI policy certification and SFI disclosure form. It may also require the completion of FCOI training and assessment prior to submission. Plan ahead and contact ORSP early to meet these requirements.

What are my responsibilities?

All investigators subject to UWL's policy are responsible for completing the following before proposal submission:

- 1. *Proposals to any federal agency: Complete a [significant financial interest \(SFI\) disclosure form](#).***
 - Fill out the online SFI disclosure form³. Report all of your SFIs and those of your immediate family. SFIs should be related to your institutional responsibilities, field of professional interest, and/or the sponsored project.
 - Each investigator must complete a separate SFI disclosure form for each proposal in which they are involved.
 - If an award is funded, an updated SFI disclosure form must be completed annually by June 30 and within 30 days of when new SFIs are obtained or discovered.
- 2. *Additional requirement for proposals to PHS agencies and other agencies following PHS FCOI regulations⁴: Complete FCOI training and assessment.***
 - Contact ORSP (grants@uwlax.edu, 608.785.8007) to be added to the FCOI course in Canvas.
 - Access the course as a student.
 - View the training presentation.
 - Complete the 10-question assessment. You must score at least 80% to pass but can take it as many times as needed.
 - The training and assessment needs to be re-completed once every four years if you have an active PHS award or are applying to a PHS agency (or an agency following PHS FCOI regulations).
- 3. *Research contracts with a non-federal entity⁵: Complete a [significant financial interest \(SFI\) disclosure form](#).***
 - Fill out the online UWL SFI disclosure form³. Report all of your SFIs and those of your immediate family.
 - If an award is funded, an updated SFI disclosure form must be completed annually by June 30 and within 30 days of when new SFIs are obtained or discovered.
 - *MVAC*: In lieu of a separate disclosure for each contract, MVAC investigators engaged in research contract work will complete an SFI Disclosure Form annually by June 30 for all current and anticipated contracts with non-federal entities. An updated form must be submitted within 30 days of when new SFIs are discovered or acquired.

¹ For the full UWL policy, see <https://www.uwlax.edu/grants/financial-conflict-of-interest-fcoi/>.

² For additional help, see UWL's guidance document, [FCOI: Identifying Investigators](#).

³ Access the SFI disclosure form here: <https://www.uwlax.edu/grants/financial-conflict-of-interest-fcoi/>.

⁴ Examples of PHS agencies include the CDC, FDA, HRSA, NIH, and SAMHSA ([full list of PHS agencies](#)). Several non-PHS agencies also follow the PHS FCOI regulations, such as the American Heart Association and American Cancer Society.

⁵ For more information, see [Wis. Stat. § 946.13](#) and [UW System policy 13-6: Contracts with Research Companies](#).

What is (and is not) a significant financial interest (SFI)?

Items that are **not** considered SFIs, and thus do not need to be reported, include:

1. Payments or equity interests *not* related to the investigator's institutional responsibilities, field of professional interest, or the sponsored project
2. Salary, royalties, or other payments from the investigator's institution
3. Income from investment vehicles (e.g., mutual funds, retirement accounts) so long as the investigator does not directly control the investment decisions made in these vehicles
4. Income from seminars, lectures, or teaching engagements sponsored by US public or non-profit organizations
5. Income from service on advisory committees or review panels for US public or non-profit organizations
6. Any equity interests in an organization that is applying to an SBIR or STTR program (if the investigator is disclosing SFIs for the same proposal)

Items that **are** considered SFIs, and thus need to be reported, include payments received by or equity interests owned by the investigator (and/or their immediate family members) that are listed in the table below *and* are related to the investigator's institutional responsibilities (e.g., consulting, research, teaching, writing), field of professional interest, or the sponsored project. In determining value of SFIs, investigators should aggregate the values of payments received or equity held by themselves as individuals in addition to those received or held by their immediate family members.

SFI Overview

| Type of Entity | Type of Financial Interest | Value |
|--|--|---|
| Publicly traded US entity | Any payments, including but not limited to salary or other payments for services (e.g., consulting fees, honoraria, paid authorship) | Totaling \$5,000 or more in the preceding 12 months alone or in aggregate with equity interests in the entity |
| | Equity interests (e.g., stocks, stock options, convertible bonds, other ownership interests) | Totaling \$5,000 or more (as determined through reference to public prices or other reasonable measures of fair market value) alone or in aggregate with other payments received from the entity; <i>or</i> representing 5% or more ownership interest in any single entity |
| Non-publicly traded US entity | Any payments, including but not limited to salary or other payments for services (e.g., consulting fees, honoraria, paid authorship) | Totaling \$5,000 or more in the preceding 12 months |
| | Equity interests (e.g., stocks, stock options, convertible bonds, other ownership interests) | Any amount |
| N/A | Intellectual property rights and interests (e.g., patents, copyrights, royalties from such rights) | Any amount already paid or expected to be paid for the preceding 12 months |
| Any US entity that is <i>not</i> a federal, state, or local government agency; institution of higher education (IHE); academic teaching hospital; medical center; or research institute affiliated with an IHE | Reimbursed or sponsored travel (i.e., travel paid on behalf of the investigator and not reimbursed to them so that the exact monetary value may not be readily available) | Any amount |
| Any foreign entity (inclusive of institutions of higher education, government entities, and non-profit organizations) | Any financial interests (including but not limited to payments of all types, honoraria, consulting fees, paid authorship, investments, equity interests, intellectual property rights and interests, royalties, reimbursements, and/or sponsorships) | Any amount |
| Any research company with which a contract will be established | Any financial interests | Any amount |