

Overview of UWL Financial Conflict of Interest (FCOI) Policy for Federal Sponsored Projects (non-PHS)

To which projects does the policy apply?

The UWL FCOI policy for federal sponsored projects¹ (non-PHS agencies) applies to all proposals to and awards from all federal agencies (including agencies that use federal flow-through funding), with the exception of PHS agencies. UWL has established a separate FCOI policy for PHS agency sponsored projects (e.g., CDC, FDA, NIH, SAMHSA)².

To whom does the policy apply?

The policy applies to principal investigators (PIs)/project directors (PDs) and co-investigators responsible for the design, conduct, or reporting of research. PIs are responsible for informing other individuals working on their research of their obligation to report any potential significant financial interests (SFIs). If an individual indicates they have a SFI to report, a PI should direct them to contact the Office of Research & Sponsored Programs (ORSP) and fill out an online SFI disclosure form.

What are my responsibilities?

All UWL PIs/PDs and co-investigators are responsible for the following before a proposal can be submitted:

- **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. SFIs should be related to your institutional responsibilities and/or field of professional interest.
 - Each PI/PD and co-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 within 30 days of when new SFIs are obtained or discovered.

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 university responsibilities or professional field of interest
2. Salary, royalties, or other payments from the university
3. Income from seminars, lectures, or teaching engagements sponsored by public or non-profit organizations
4. Income from service on advisory committees or review panels for public or non-profit organizations
5. 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 (or their immediate family members) that are listed in the table below *and* are related to the investigator's university responsibilities and/or professional field of interest.

SFI Overview

Type of Entity	Type of Financial Interest	Value
Publicly traded 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
Non-publicly traded 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

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

² PHS FCOI policy information can be found at the same UWL website.

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