

Overview of UWL Financial Conflict of Interest (FCOI) Policy for PHS Agency Sponsored Projects

To which projects does the policy apply?

The UWL FCOI policy for Public Health Service (PHS) agency sponsored projects¹ applies to all proposals to and awards from PHS agencies². Examples of PHS agencies include the CDC, FDA, NIH, and SAMHSA.

To whom does the policy apply?

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 collaborators³.

If a project involves external collaborators, note that they may also be subject to FCOI requirements at UWL and their home institution. For example, there are specific requirements that must be completed by all subrecipients before a proposal can be submitted. Plan ahead and contact ORSP early to meet these requirements.

What are my responsibilities?

All investigators are responsible for completing the following items before a proposal can be submitted:

1. 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.

2. Complete a significant financial interest (SFI) disclosure form.

- Complete the FCOI training first to understand what, if any, SFIs you have that need to be disclosed.
- Fill out the online UWL SFI Disclosure Form⁴. 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 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.

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

² For a comprehensive list of PHS agencies, see <https://www.usphs.gov/aboutus/agencies/hhs.aspx>.

³ For additional help, refer to UWL's guidance document, PHS FCOI: Identifying Investigators: <https://www.uwlax.edu/globalassets/offices-services/grants/fcoi-investigator-definition.pdf>.

⁴ Access the SFI disclosure form here: <https://www.uwlax.edu/grants/financial-conflict-of-interest-fcoi/#tm-sfi-disclosure-form>.

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
N/A	Intellectual property rights and interests (e.g., patents, copyrights, royalties from such rights)	Any amount upon receipt of income
Any 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