

**UW-L FCOI Policy:
Federal Sponsored
Projects
(aside from PHS)**

UW-L PIs, co-
PIs, PDs

Other UW-L
investigators

Subrecipient
investigators

AVCAA: Associate Vice Chancellor for
Academic Affairs
FCOI: financial conflict of interest
ORSP: Office of Research &
Sponsored Programs
PD: project director
PI: principal investigator
SFI: significant financial interest

No action is required.

Fill out SFI Disclosure Form
before submission
& within 30 days of
new SFI.

Records filed by
ORSP.

FCOI identified
by committee?

FCOI
Management
Plan
developed by
committee.

Potential FCOI
identified by AVCAA?

FCOI
Committee
convened.

Investigator
approves or appeals
FCOI Management
Plan/Mitigation
Plan.

Investigator completes
prescribed actions & certifies
completion and ongoing
compliance to ORSP.

Retrospective review
completed within 120
days by FCOI
Committee. Interim
disciplinary actions
may be imposed.

Bias
identified

Mitigation plan
developed.
Disciplinary
actions
imposed.

Chancellor
determines plan.

Records filed
by ORSP.

