

Financial Conflict of Interests Module

Winona State University
Grants & Sponsored Projects

Financial Conflict of Interests (FCOI)

Federal requirements:

- The Public Health Service (PHS) and National Science Foundation (NSF) require the university to provide training related to FCOI for all investigators
- WSU must be prepared to provide evidence that training programs exist and be able to document that investigators have completed the required programs
- See the NIH [FCOI policy and compliance](#)
- See the NSF [COI policies](#)

How WSU implements FCOI policies

WSU Reg. 3-28 meets PHS disclosure requirements.

PIs should continue to review this module and also note:

- PHS agencies such as NIH and HRSA and some private sponsors using PHS regulations such as the American Heart Association and American Cancer Society, require completion of the NIH FCOI tutorial. PIs must submit a certificate of completion to Grants & Sponsored Projects.
- PIs applying to NSF are required to complete a training module on the Responsible Conduct of Research. The module is available at the University of Illinois Ethics Resource Center. WSU can confirm completion by accessing their data base.

WSU definitions

An “investigator” is defined as:

- Project director
- Principal investigator
- Any person responsible for design, conduct, or reporting of research
- Sub-grantees, consortium participants, collaborators, or consultants

Research activities involve:

- Basic and applied research
- Product development

FCOI – what is covered?

“Significant financial interests” exist if:

- You (and your family members) have received, in the last 12 months
 - Income and equity over \$5,000 from a publicly traded entity
 - Any income and equity from a private entity
 - Payments over \$5,000 for intellectual property rights
 - Travel reimbursements from any entity (not including WSU)

Significant financial interests are not:

- Payments from WSU
- Income from seminars, lectures, teaching engagements, service on advisory committees, service on review panels, or travel reimbursements supported by a federal agency, institution of higher education, or medical center
- Pension fund or investment income in which the investigator makes no investment decisions

Disclosure requirements

When to disclose:

- At the time of proposal submission
- Annually when progress reports are filed
- Within 30 days of acquiring or discovering a new FCOI

How to disclose:

- Review this education module
- Submit the WSU Disclosure form to Grants & Sponsored Projects
- For PHS grants, complete the NIH FCOI tutorial and submit the completion certificate to Grants & Sponsored Projects
- For NSF grants, complete the Ethics Resource Center module and notify G&SP

FCOI management

If you have no potential conflicts of interest, the disclosure form will simply be kept on file.

If there are any significant FCOIs, the institution will work with you to determine the best method for managing those conflicts to ensure that the conduct of research will be free from bias. A management plan may include:

- Public disclosure when publishing or presenting
- Disclosure to participants in human subjects research
- Appointment of an independent monitor
- Modification of the research plan
- Change of personnel or responsibilities
- Reduction or elimination of the financial interest