



Policy Title: Financial Conflicts of Interest	
Functional Area: Office of Sponsored Research Administration (OSRA)	
Purpose: To assure objectivity in research by ensuring proper disclosure and management of financial conflicts of interest by SSU researchers	
Documents (Info) Needed:	
Responsible Executive/Office:	Director, Office of Sponsored Research Administration (OSRA)
Reviewed By <or> Reviewed By:	Associate Vice President, Research and Sponsored Programs
Related Policies: n/a	
Date Created: February 15, 2018	Date Approved: February 18, 2018
Date Last Revised: n/a	Effective Date: February 18, 2018

POLICY/ STATEMENT OF POLICY:

This policy aims to promote objectivity in research and ensure transparency and accountability in relationships between researchers, research institutions, research sponsors, and the private sector, by requiring disclosure and management of all relevant significant financial conflicts of interest (FCOI) of researchers who are funded by agencies requiring such disclosure (HHS, NSF, etc.)

REASON FOR THIS POLICY

In accordance with federal regulations established by federal agencies (Department of Health and Human Services, NSF, etc.), this policy aims to ensure the objectivity and transparency of research funded by these agencies by requiring significant FCOI disclosures by affected researchers. If significant financial conflicts are identified that may affect the objectivity of the proposed research, they must be managed, reduced, or eliminated before the research can be approved for implementation at SSU.

INDIVIDUALS AND ENTITIES AFFECTED BY THIS POLICY

All faculty, staff, and students of SSU who are engaged in research

WHO SHOULD KNOW THIS POLICY

All faculty, staff, and students of SSU who are engaged in research

EXCLUSIONS

None

CONTACTS

Subject	Contact	Telephone	E-mail/Web Address
Policy Clarification	Director, OSRA	912-358-4427	http://www.savannahstate.edu/osra

DEFINITIONS

FCOI – Financial Conflicts of Interest
HHS – Department of Health and Human Services
NIH – National Institutes of Health
NSF – National Science Foundation
PHS – Public Health Service
SFI – Significant Financial Interest

Promulgation (Word to be defined)

Official declaration that a policy is in effect. (Definition)

RESPONSIBILITIES

All personnel (faculty, staff, subcontractors, etc.) who are responsible for managing or conducting research projects funded by federal agencies requiring FCOI disclosure (HHS, NSF, etc.) and who are responsible for the design, conduct, and reporting of such research are required to disclose all significant financial interests (SFIs) that may affect the research prior to submission of the funding proposal, and upon award, to make annual disclosures or more frequently as required. All personnel who are funded by these agencies (HHS, NSF, etc.) who disclose such SFIs must complete mandatory training in the requirements of compliance with FCOI regulations prior to beginning the research project. If SFIs are disclosed, the personnel must work with OSRA to determine if FCOIs exist that might affect the objectivity of the funded research and if so, to develop a plan to manage, reduce, or eliminate such conflicts as required prior to beginning work on the project.

The Office of Sponsored Research Administration (OSRA) is responsible for overseeing compliance with this policy, including a) reviewing disclosures of SFIs, b) determining if SFIs might affect the proposed research and if so, in conjunction with academic leadership, to develop a plan to manage, reduce, or eliminate the conflict prior to the start of the project, and c) overseeing mandatory training by affected personnel. OSRA is responsible for managing the procedures for disclosure, review, management, and monitoring of all FCOIs, and for reporting to NIH in a timely manner if FCOIs are determined to exist. OSRA will implement enforcement mechanisms to ensure remedies for noncompliance are in place. This policy will govern subrecipients as well as SSU researchers. OSRA will maintain records as required including public accessibility requirements.

PROCEDURES

Procedures documentation has been developed to support the implementation of this policy.

RELATED DOCUMENTS, FORMS AND TOOLS

FCOI regulations: 42 CFR Part 50 Subpart F
https://grants.nih.gov/grants/compliance/42_CFR_50_Subpart_F.htm



NIH FCOI resources:

<https://grants.nih.gov/grants/policy/coi/index.htm>

NIH FCOI Training Tutorial

<https://grants.nih.gov/grants/policy/coi/tutorial2011/fcoi.htm>

NSF FCOI Regulations: https://www.nsf.gov/pubs/policydocs/pappguide/nsf08_1/aag_4.jsp

HISTORY AND UPDATES

Current Major Version Changes [**DO NOT ALTER -- Populated by the System/Updated by the System**]

APPENDIX

Appendices are used for informational material that is helpful, but not directly related to the implementation of the policy.