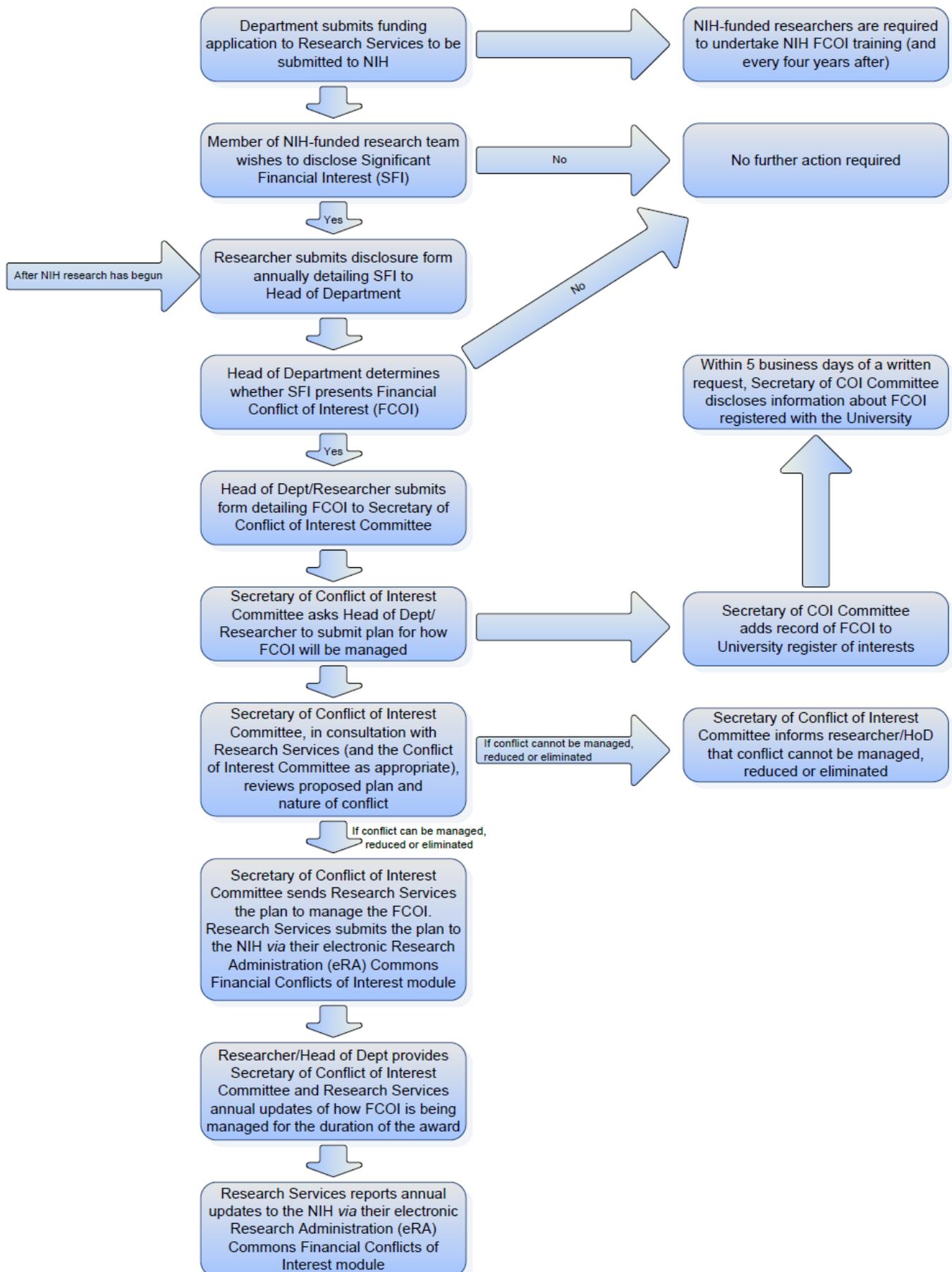


Procedure for disclosing and managing Financial Conflicts of Interest (FCOI) relating to NIH-funded research



Text version:

1. Department submits funding application to Research Services to be submitted to NIH
 - NIH-funded researchers are required to undertake NIH FCOI training (and every four years after)

If a member of NIH-funded research team wishes to disclose Significant Financial Interest (SFI):

2. After NIH research has begun, the researcher submits a disclosure form annually detailing SFI to Head of Department
3. Head of Department determines whether SFI presents Financial Conflict of Interest (FCOI)
 - If no: no further action required
 - If yes: Head of Department/Researcher submits form detailing FCOI to Secretary of Conflict of Interest Committee
4. Secretary of Conflict of Interest Committee asks Head of Department/Researcher to submit plan for how FCOI will be managed
 - Secretary of COI Committee adds record of FCOI to University register of interests
 - Within 5 days of a written request, Secretary of COI Committee discloses information about FCOI registered with the University
5. Secretary of Conflict of Interest Committee, in consultation with Research Services (and the Conflict of Interest Committee as appropriate), reviews proposed plan and nature of conflict
 - If conflict cannot be managed, reduced or eliminated: Secretary of Conflict of Interest Committee informs researcher/HoD that conflict cannot be managed, reduced or eliminated
 - If conflict can be managed, reduced or eliminated: Secretary of Conflict of Interest Committee sends Research Services the plan to manage the FCOI. Research Services submits the plan to the NIH via their electronic Research Administration (eRA) Commons Financial Conflicts of Interest module
6. Researcher/Head of Department provides Secretary of Conflict of Interest Committee and Research Services annual updates of how FCOI is being managed for the duration of the award
7. Research Services reports annual updates to the NIH via their electronic Research Administration (eRA) Commons Financial Conflicts of Interest Module