For applicants for PHS (e.g. NIH) funding Conflict of Interest regulations – WHAT TO DO AND WHEN

Important: please read in conjunction with full information available <u>here</u>

TIMELINE	INVESTIGATOR	HoD/DA
Prior to making the application	Step 1 Submit a disclosure form to declare any Significant Financial Interests to Head of Department.	Review submission to determine whether any disclosures are related to research funded through a PHS funder. Do they constitute a Financial Conflict of Interest?
Application stage	Cooperate with HoD/DA in developing a management plan for any SFI deemed to be a FCOI and in complying with such plan.	Set out a plan to manage, reduce or eliminate the conflict.
Award stage	Step 2 Undertake training through http://grants.nih.gov/grants/policy/coi/tutorial2011/fcoi.htm and by familiarising self with full guidance available here .	Within 60 days of disclosure, submit plan to Research Operations Office, who will submit to the PHS funder (where NIH, via eRA Commons). Initial reports must be submitted prior to expenditure of funds.
Duration of award	Repeat Step 1 annually throughout duration of award and within 30 days of discovering or acquiring a new SFI.	Submit annual FCOI reports to address status of financial interest and any changes to the management plan. Submit alongside annual progress report. Monitor adherence to the management plan.
		Make public by written response any FCOI relating to PHS funded research within 5 working days of request.