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 here

TIMELINE	INVESTIGATOR			HoD/GD
Prior making application	Step 1 Submit a <u>disclosure form</u> to declare any <u>Significant Financial Interests</u> 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? Set out a plan No action	
Application stage	Cooperate with HoD/GD in developing a management plan for any SFI deemed to be a FCOI and in complying with such plan.			Set out a <u>plan</u> No action
				required. reduce or eliminate the conflict.
Award stage				
	http://grants.nih.gov orial2011/fcoi.htm ar	Step 2 Undertake training through http://grants.nih.gov/grants/policy/coi/tut orial2011/fcoi.htm and by familiarising self with full guidance available here.		Within 60 days of disclosure, submit plan to Research 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.	Repeat Step 2 at least every 4 years.		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.