

Title: The Review of Conflict of Interest (COI) Disclosure Forms for PHS, NFS and Privately Funded Research

SOP #1

Department: Office of Research Integrity and Compliance

Background:

UC Merced adheres to the University of California's policies on [Disclosure of Financial Interests & Management of Conflicts of Interest, Public Health Service Research Awards, Disclosure of Financial Interests and Management of Conflicts of Interest, National Science Foundation Awards, and Academic Personnel Manual Section 028-10](#). These policies address the requirements for investigators to be subject to specific requirements regarding the disclosure and management of conflicts of interest in research in order to provide a reasonable expectation that funded research will be conducted free of bias resulting from Investigator financial conflicts of interest.

1. For PHS or NSF funded research, the UC Merced investigator will make an initial disclosure of a potential conflict of interest during the proposal process with the Sponsored Projects Office (SPO).
 - a. If a positive disclosure is made, the SPO staff will prompt the investigator to complete the *Financial Disclosure Form for Non-PHS Funded Research & Agencies following NSF FCOI Regulations* or the *Financial Disclosure Form for PHS Funded Research & Agencies following PHS FCOI Regulations*.
 - b. The COI Office will conduct a review of the form. The COI Office will provide the investigator with the *Investigator's Disclosure of Economic Interests Addendum form* which collects additional detailed information.
 - c. If the project is awarded, the positive COI disclosure will be routed to the Designated Official or COI Committee for review.
2. For privately funded research, the COI Office will be notified by the Gift Administration Office of a pending gift and a 700U form will be provided to the PI for completion.
 - a. The COI Office will conduct a review of the completed 700U form. The COI Office will provide the investigator with the *Investigator's Disclosure of Economic Interests Addendum form* which collects additional detailed information.
 - b. Positive COI disclosures will be routed to the Designated Official or COI Committee for review.
3. The Designated Official or COI Committee will review all positive COI disclosures. If the Designated Official or Committee determines that the disclosed financial interests constitute a real or perceived conflict of interest, they will recommend actions designed to eliminate, reduce, or manage the conflict. In some instances, the Official or Committee may simply recommend disclosing the interest in all publications and presentations. Depending on the facts, the Official or Committee may also recommend other measures

such as divestiture of all equity interest in the sponsor or elimination of any consulting arrangement with the sponsor. Management or elimination of conflicts of interest may include but are not limited to:

- Withdrawal of proposal
 - Non-acceptance of the gift or grant
 - Notice to students and other project personnel of Investigator's conflicting interests
 - Appointment of additional, non-conflicted student advisors
 - Public disclosure of the related financial interest
 - Monitoring of the project by independent reviewers
 - Modification of the research or project plan
 - Disqualification from participation in all or a portion of the project
 - Divestiture of the related financial interest(s)
 - Severance of relationships that create actual or potential conflicts
4. The management plan will be provided to the PI and the Department Chair for review. Once all parties accept the COI management plan, it will be signed by the Investigator and the VCR.
 5. For any COI cases involving financial interest in foreign activities, the COI office will engage the Chief Ethics and Compliance Officer (CECO). The final COI management plan will be provided to the CECO to ensure that the CECO receives information on significant financial interest in foreign activities.