

Financial Conflict of Interest (FCOI) Responsibility Procedure - Designation of Sponsored Programs Responsibilities

I. Introduction

A. Purpose

To define the responsibilities of the Office of Sponsored Programs (OSP) in ensuring compliance with Financial Conflict of Interest (FCOI) regulations for both proposal submissions and annual certifications involving sponsored research.

B. Scope

This procedure applies to grant or contract-funded research activities conducted at the University of San Diego, including but not limited to, PHS (NIH) and NSF-funded projects.

II. Definitions

1. *Financial Conflict of Interest (FCOI)*: A Financial Conflict of Interest exists when a Significant Financial Interest (SFI) could directly and significantly affect the design, conduct, or reporting of research.
2. *Investigator*: The project director or principal investigator, and any other person responsible for the design, conduct, or programmatic reporting of research.
3. *SFI Disclosure*: A financial disclosure required by the institution's FCOI policy.
4. *Annual Certification*: A required, recurring confirmation by investigators disclosing and updating any SFIs.

III. Responsibilities of the Office of Sponsored Programs (OSP)

A. Responsibilities at Proposal Submission

1. FCOI Policy Confirmation
 - a) Ensure that all investigators named by the Principal Investigator listed on the Research Investigator tab at time of internal proposal routing in Cayuse have reviewed and agreed to abide by the institution's FCOI policy.
2. Disclosure Collection & Review Coordination
 - a) Verify that each listed investigator has submitted a current and complete FCOI disclosure form.
 - b) Check if the investigator has indicated a possible SFI within the disclosure form(s).
 - c) Forward disclosures indicating potential conflicts to the predetermined institutional official for review.
3. Proposal Submission Certification
 - a) Confirm in the proposal system or sponsor portal that all FCOI requirements have been met prior to submission.
 - b) Include institutional assurance, when required, that a university FCOI policy is in place.

4. Responsibility Limitation – Post-Routing Personnel
 - a) **OSP is not responsible for ensuring FCOI compliance for project personnel added to the project after the initial proposal routing.**
 - b) It is the responsibility of the Principal Investigator and/or department administrator to notify new personnel of their obligations and to ensure they complete the required disclosures and training before participating in the project.
5. Documentation
 - a) Maintain proposal-related FCOI disclosure forms as part of the proposal file in Cayuse.

B. Responsibilities at Award

1. Training Verification
 - a) Confirm that each investigator listed in Cayuse is current with FCOI training (within the past four years) at the time a new award is received, and account set-up is requested from External Funds Accounting.

C. Responsibilities for Annual Certification

1. Notification & Collection
 - a) Send annual notification to investigators listed in Cayuse involved in active research awards known to require FCOI compliance.
 - b) Collect updated FCOI disclosures annually, even if no changes have occurred.
2. Record Retention
 - a) Retain documentation of annual certifications and related communications in accordance with federal and institutional records retention policies (typically eight years from the end of the final expenditure report).

IV. Compliance and Enforcement

1. Sponsored Programs will notify institutional officials of any investigator who fails to comply with disclosure or training requirements.
2. Sponsored project funds may be delayed until all FCOI compliance obligations are met.

V. Related Policies and Regulations

1. Institutional [FCOI Policy 2.7.3](#)
2. 42 CFR Part 50 Subpart F (PHS Regulations)
3. NSF Proposal & Award Policies and Procedures Guide (PAPPG)