



OFFICE OF THE VICE CHANCELLOR  
FOR RESEARCH

# IDENTIFYING COI USING MYPROPOSALS

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# myProposals COI question

(located in Supplement section)

**Conflict of Interest (COI): \***

Yes  No

**COI Description:**

# Former PAF COI question

*At present or in the 12 months prior to this disclosure, do you or your family members have a significant financial interest (SFI) with the research sponsor or any sub-contract recipient?*

*Or have **any other relationships** or sponsored or reimbursed travel that may present a potential financial conflict of interest with the proposed research?*

# Who does COI apply to?

- Applies to all **Investigators** regardless of the funding source and **senior/key personnel** on HHS/PHS/NIH sponsored research
- Family members' interests

# Investigator / Senior Key Personnel

## 7. What is the definition of an Investigator?

An "Investigator" is defined as the project director or principal investigator or any other person, regardless of title or position, who is responsible for the design, conduct, or reporting of the sponsored research or proposed sponsored research, which may include, for example, collaborators or consultants.

The PI must consider the role, rather than the title, of those involved in research and the degree of independence with which those individuals work. When the definition of investigator is limited to titles or designations (e.g., to principal investigators, key personnel, faculty) the risk is that an unidentified FCOI may compromise the research enterprise increases.

### 1. Do the federal regulations apply to a consultant or a collaborator who is not employed by the University of Illinois?

Yes. If the consultant or collaborator meets the definition of "investigator."

- If the consultant or collaborator is covered by a sub-contract agreement between the University of Illinois and an institution that attests to having a FCOI policy that meets the requirements of the federal regulations; then the consultant or collaborator would follow the FCOI policy at the sub-recipient institution.
- If the consultant or collaborator is not under any sub-contract agreement with the University of Illinois, then the consultant or collaborator must follow the University of Illinois' Policy on Conflict of Commitment and Interest; complete the University of Illinois FCOI training; and submit disclosures of significant financial interests to the University of Illinois.

### 2. Do the federal regulations apply to a Post-doctoral Fellow?

Yes. If the Post-doctoral Fellow meets the definition of "investigator."

### 3. Do the federal regulations apply to a graduate student?

Yes. If the graduate student meets the definition of "investigator."

## 8. Who qualifies as "senior / key research personnel" on PHS sponsored research?

Senior/Key Personnel means the Project Director / Principal Investigator (PD/PI) and any other person identified as senior/key personnel by the University in the grant application, progress report, or any other report submitted to the HHS/PHS/NIH by the University.

All senior/key personnel must be listed of the FCOI Checklist, however, the PI may determine that a senior/key person does not meet the definition of "Investigator."

## 9. Is the investigator required to report the significant financial interests of family members?

Yes. According to the University *Policy on Conflict of Commitment and Interest*, "family members" include spouse or domestic partner, parents, siblings, and children when the family member's significant financial interest is reasonably related to the investigator's research or University responsibilities; or if the family member has a financial interest in an entity that contracts or does business with the University.

SFI FAQs: [http://research.uic.edu/coi/managing-conflicts/faqs\\_sfi\\_dmp](http://research.uic.edu/coi/managing-conflicts/faqs_sfi_dmp)

# When are you required to disclose?

- In accordance with University Policy on Financial Conflict of Interest in Research, **significant financial interests (SFIs)** must be disclosed to the COI Office **at the time of proposal** and **within 30 days** of any newly acquired or discovered SFIs or changes in the reported SFIs on the awarded grants.

## 4. What is a significant financial interest (SFI)?

A Significant Financial Interest (SFI) (42 CFR 50.603) is identified when:

- The value of any remuneration received from an external entity at present or in the 12 months preceding the disclosure that when aggregated for the individual, one's spouse or domestic partner, parents, siblings, and children totals or exceeds \$5,000. The \$5,000 threshold also applies to salary, royalties, and other payments aggregated for the individual, one's spouse or domestic partner, parents, siblings, and children.
- Publicly-traded equity if the value of the equity (plus any remuneration) meets or exceeds \$5,000.
- Any level of ownership of privately-held equity regardless of the dollar value.

## What are some examples of significant financial interests that are required to be reported?

Financial Interest	Examples	Thresholds for SFI
Remuneration, income, salary, and any payment for services	Consulting fees, honoraria, paid authorship	\$5,000 or more
Public equity interest	Stock, stock option, or other ownership interest	Present day market value of \$5,000 or more
Private equity interest	Stock, stock option, or other ownership interest	Any ownership interest regardless of percentage or dollar value
Intellectual Property (IP) rights and interests	Patents not assigned to the University of Illinois; licenses from the University of Illinois to an external entity; copyrights; royalties that are not paid by the University of Illinois	When profit or remuneration from IP interests meets or exceeds \$5,000
Fiduciary role	Executive role, a voting member of the board	Report fiduciary relationships (even if unpaid) that may be reasonably related to your research or University responsibilities; or with an entity that does business with the University.
Sponsored or reimbursed travel	Travel paid by an external entity (including airfare, gas, car rental, hotel room, meals, stipends, etc). Travel must be reported from any entity unless the travel is reimbursed or sponsored by a federal, state, or local government agency, an Institution of higher education as defined by 20 U.S.C. 1001(a); an academic teaching hospital, a medical center, or a research institute that is affiliated with an Institution of higher education. View the <a href="#">Understanding PHS travel disclosure - OVCR at ILLINOIS</a> video.	\$5,000 de minimis for reporting.
Foreign Financial Interests	Investigators, including subrecipient Investigators, must disclose financial interests received from a foreign Institution of higher education or the government of another country (which includes local, provincial, or equivalent governments of another country).	\$5,000 or more.



# Foreign Financial Interest

- Federal government has expressed particular interest in disclosures of foreign financial interests.
  - NIH Letter  
<https://www.sciencemag.org/sites/default/files/NIH%20Foreign%20Influence%20Letter%20to%20Grantees%2008-20-18.pdf>
  - NSF Letter  
<https://www.grassley.senate.gov/news/news-releases/grassley-expands-government-grant-integrity-probe-national-science-foundation>
- OVCR Export Control Officer will monitor disclosures.
  - <http://research.uic.edu/foreign-influence-uic-research-and-scholarship>

# What are FCOI?

- Examples of Financial Conflicts of Interest include, but are not limited to:
  - Financial interest with sponsor
  - Sub-contracting to entity with financial interest
  - SBIR/STTR applications
  - Nepotism
  - Using, testing, evaluating intellectual property
  - University responsibilities require interacting with the external entity
  - Organizational COI (gifts, investments, key organizational leader has interest)
- FCOIs typically require a management plan; or elimination.

# Certification

Each investigator will certify on myProposals:

*Any investigator with a significant financial interest (SFI) or organizational conflict related to the proposed project or any subcontract recipient must disclose the SFI and/or the organizational COI to the University COI Office at the time of proposal and identify the conflict is related to this project. Failure to disclose and manage conflicts may result in violation of federal regulations and could delay award execution or jeopardize the award.*

# Questions

## Contacts

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## Resources

- START myDisclosures:  
<https://myresearch.uillinois.edu/myDisclosures/>
- SFI FAQs:  
[http://research.uic.edu/coi/managing-conflicts/faqs\\_sfi\\_dmp](http://research.uic.edu/coi/managing-conflicts/faqs_sfi_dmp)