Research-Based Financial Conflict of Interest Disclosure

Developed By: Office of Research Support and Development
Responsible Office: Research Security
Applies To: All sponsored research proposals and awards that are subject to Research-Based Financial Conflict of Interest (FCOI) disclosure requirements.

Purpose

To promote transparency, safeguard objectivity in research, and ensure compliance with federal regulations and sponsor requirements, all Principal Investigators (PIs) and senior/key personnel are required to complete a Research-Based Conflict of Interest / Financial Conflict of Interest (FCOI) disclosure for each proposal submitted. This form must be submitted at key points in the proposal and award lifecycle — including at the time of proposal submission, prior to the expenditure of funds, and at any time when relevant financial interests change.

The purpose of this FCOI process is to identify and manage any financial interests or relationships that could reasonably affect, or be affected by, the design, conduct, or reporting of sponsored research. This research-specific disclosure is aligned with, but distinct from, The University of Southern Mississippi's (USM) annual Outside Activities Report (the COI/COC disclosure). While the Outside Activities Report addresses a broad range of professional and external engagements, this FCOI form focuses specifically on financial interests that may intersect with sponsored projects.

Completion of this form is required for every PI and applicable key person (Co-PI / Co-I) on each proposal or active award to ensure continued compliance with institutional policy and federal regulations, including Public Health Service (PHS) and NSF requirements. Accurate and timely reporting supports the integrity of the USM's research enterprise and protects both individual investigators and the institution.

Guidance

This information is intended to assist PIs and applicable senior/key personnel at USM in determining when FCOI disclosures and COI review may be required for sponsored proposals and awards. This guidance is provided for general reference; PIs and key personnel should review sponsor-specific award terms and conditions to confirm applicable COI requirements.

Sponsors Subject to PHS FCOI Regulations

The following federal agencies and non-federal sponsors operate under, or have adopted, the PHS FCOI regulations as their conflict-of-interest policy. For projects funded by these sponsors, PIs and applicable senior/key personnel are required to complete CITI training before engaging in the research and renew this training at least every four (4) years, or sooner if required by institutional policy or sponsor-specific circumstances.

Federal Agencies

- Agency for Healthcare Research and Quality
- Agency for Toxic Substances & Disease Registry
- Centers for Disease Control & Prevention
- Food and Drug Administration
- Health Resources & Services Administration
- Indian Health Service
- National Institutes of Health
- Office of the Secretary, U.S. Department of Health & Human Services
- Substance Abuse & Mental Health Services Administration

Organizations (this list is subject to change)

- Alliance for Lupus Research
- Alpha 1 Foundation
- American Asthma Foundation
- American Cancer Society
- American Foundation for Suicide Prevention
- American Heart Association
- American Lung Association
- Arthritis Foundation
- Crohn's & Colitis Foundation of America
- CurePSP
- Harrington Discovery Institute
- Johnson & Johnson
- Juvenile Diabetes Research Foundation
- Lupus Foundation of America
- Patient Centered Outcomes Research Institute
- Susan G. Komen Foundation

Federal Sponsor COI Policies

The following federal sponsor COI policies are publicly available and provide additional context on agency-specific conflict-of-interest requirements.

- **National Institutes of Health FCOI**
- **National Science Foundation COI**
- **Department of Energy Interim Policy**
- **National Aeronautics & Space Administration Grant Information Circulator**

Questions?

For questions about COI policies, outside interest disclosure requirements for USM, and USM's COI review and management processes, email Research Security at conflicts@usm.edu.