
From: All Faculty [<mailto:ARCHNEWSFACULTY@LISTSERV.UGA.EDU>] **On Behalf Of** ArchNews
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To: ARCHNEWSFACULTY@LISTSERV.UGA.EDU
Subject: Financial conflict of interest

TO: UGA Faculty
FROM: David Lee, Vice President for Research
SUBJECT: Financial Conflict of Interest

UGA will implement a new *Policy on Conflicts of Interest in Sponsored Programs*, effective August 25, 2012, to comply with new, stricter U.S. Department of Health and Human Services (DHHS) regulations for all Public Health Services (PHS) units, including the NIH, CDC, FDA, Indian Health Service (IHS), Health Resources and Services Administration (HRSA), and the Agency for Healthcare Research and Quality (AHRQ).

UGA will apply the new PHS requirements **ONLY** to those Investigators submitting to PHS units. However, all UGA investigators must use the new DHHS/PHS *Disclosure of Significant Financial Interests* form (<http://fcoi.ovpr.uga.edu>) when required to do so. As a reminder, all University employees must comply with UGA's *Policy on Conflicts of Interest in Sponsored Programs* and must disclose any activity that might constitute a financial conflict of interest.

What are the Changes for PHS Applicants?

- All PHS Investigators (defined as “the Project Director or Principal Investigator and any other person, regardless of title or position, who is responsible for the design, conduct, or reporting of PHS-funded projects, either funded or proposed”) are covered.
- Investigators must file an annual *Disclosure of Significant Financial Interests* (SFIs) that is retrospective rather than prospective, covering the 12-month period prior to a proposal’s submission. A disclosure update is required within 30 days of discovering the presence of an unreported SFI or acquiring a new SFI.

- The *Disclosure* must cover all financial interests that have an annual monetary value of \$5,000 or more, whether or not the value is readily ascertainable.
- The *Disclosure* must have been filed by the time of proposal submission for any proposal submitted on or after August 25, 2012.
- Conflict of Interest training/education is required for *all* Investigators on PHS grant and cooperative agreement proposals. Training for UGA Investigators will be provided via the CITI on-line system that UGA uses for Responsible Conduct in Research and Human Subjects training. Training must have been completed prior to an expense being recorded in UGA's official records (i.e., training is not required at proposal time but must have been completed by award time). Refresher courses are required every four (4) years.

Who Can I Contact With Questions?

A Financial Conflict of Interest website has been established by OVPR (<http://ovpr.uga.edu/fcoi>). Researchers with questions regarding UGA's *Policy on Conflicts of Interest in Sponsored Programs*, the *Disclosure*, or the required training/education program, or anyone unsure whether a particular financial interest should be disclosed, should contact UGA's Institutional Integrity Officer to discuss the matter.

Contact Information: Dr. Regina Smith, Associate VP for Research & Institutional Integrity
Officer 617 Boyd Graduate Studies Research Center | 706.583.0443 | reginas@uga.edu