



UNIVERSITY OF SOUTH ALABAMA

Disclosure form will be updated to identify Investigators involved in PHS funded research

PHS Regulation Change: Financial Conflict of Interest What Researchers Need To Know

What does this mean for USA?

As a researcher at the University of South Alabama you are obligated to disclose all monetary financial or management interest in an outside company or other entity as it relates to your institutional responsibilities. This disclosure ensures that you and the Institution are compliant with federal regulations designed to safeguard objectivity in research. To ensure objectivity in research, new PHS financial conflict of interest regulations become effective August 24, 2012

Important Information
Who Discloses?
When you Disclose?
How USA evaluates financial conflict of interest?
Training Requirements

The principal investigator, co-investigator and other key personnel listed on the Financial Conflict of Interest Certification page (for PHS grants/contracts) must disclose financial conflict of interests at the time of grant application. In accordance with federal regulations the term "investigator" also includes the spouse and dependent children of the individuals listed. Other key personnel are individuals who have the authority to make independent decisions about the direction of the research and the subsequent conclusions about the results. This does not include administrative personnel or individuals who perform routine, pre-defined, or incidental tasks related to the project. This certification will be completed and routed along with the University Transmittal Form.
NOTE: You DISCLOSE if you are accountable for the design, conduct, and reporting of the PHS research. If an individual is merely working on, or engaged in, the research project, you do not meet USA's definition of an investigator with an obligation to disclose.

An outside financial interest is a payment for services, equity interests, and travel NOT reimbursed by a federal/state/or local government agency, or an accredited domestic institution of higher education, to include teaching hospitals, medical centers, and research institutes.

- DISCLOSE:
• ALL outside interests related to institutional responsibilities
• ANNUALLY- USA's annual disclosure is September 30th each year
• New outside interest, activities, or relationships within 30 days related to your Institutional responsibilities
• When new outside interests arise/when outside interest changes
• Travel paid for/reimbursed by outside entity (exceptions apply)
• Sub-recipients financial conflict of interests

EXCLUSIONS -> Income from seminars, lectures, teaching engagements, income from mutual funds/retirement accounts, service on advisory and review panels

- The department chair/supervisor determines if disclosure is related to research and identifies potential financial conflicts of interest
• USA Office of Research Compliance and Assurance reports to PHS agency, if applicable
• Management plan must be in place prior to PHS funding awarded
• Conflicts of interest and management plans will be available to the public upon request

- All Investigators involved in a PHS research grant must complete conflict of interest training. The CITI training tutorial will soon be available at: https://www.citiprogram.org/
• The certification must be completed (i) prior to engaging in research related to any PHS funded research and (ii) at least every four years thereafter