



## **Sponsored Programs Significant Financial Interest Policy and Procedures**

### Background:

Federal Legislation (*see* 42 CFR Part 50, Subpart F and 45 CFR Part 94) requires institutions of higher education to comply with financial conflict of interest (FCOI) training and reporting requirements for sponsored programs. Bradley University has implemented the following Sponsored Programs Significant Financial Interest Policy and Procedures to ensure compliance with federal and agency-specific FCOI requirements for sponsored programs.

*Please note:* This policy is SEPARATE from the Bradley University Conflict of Interest policy and procedures, and pertains specifically to Bradley principal investigators/project directors (PI/PDs) seeking external funding support for their work. This policy and procedures apply even if a PI/PD has submitted an annual Certification of Compliance that has been verified by his/her department chair or supervisor.

### Policy:

Bradley University principle investigators or project directors seeking or receiving funding support from an external entity must: (1) certify completion of financial conflict of interest training every four years; (2) disclose significant financial interests (SFIs) on an annual basis or no less than thirty (30) days of identifying a new SFI; and (3) comply with required financial conflict of interest identification, management, and reporting processes and procedures as necessary.

### Procedures:

To comply with the Bradley University Sponsored Programs Significant Financial Interest Policy, Bradley University PIs/PDs must:

1. Complete the Collaborative Institutional Training Initiative Conflict of Interest (CITI COI) Course under a Bradley University Learner Group and submit certification of completion to the Office of Sponsored Programs (OSP) prior to the submission of a request for funding support from an external entity OR NO LATER THAN prior to a grant or contract award from an external entity.
2. Re-take the CITI COI course OR complete the OSP Significant Financial Interest Training Manual, and submit certification of completion to the OSP, at least once every four years.
3. Submit a Sponsored Programs Significant Financial Interest (SFI) Disclosure Form to OSP prior to the submission of a request for external funding support, and then at least once annually when seeking or receiving external funding support.
4. Submit an updated SFI Form to OSP within thirty (30) days of when a new SFI is identified.
5. Cooperate as necessary with any actions that may be taken to identify and manage financial conflicts of interest in regards to a specific initiative or activity being proposed to or supported by an external entity in compliance with federal regulations for FCOI identification, management, and reporting.

## Definitions and Acronyms:

**Collaborative Institutional Training Initiative Conflict of Interest (CITI COI) Course:** Bradley University maintains a subscription to the Collaborative Institutional Training Initiative – an online research education training resource. The Conflict of Interest course covers the revised Public Health Service (PHS) regulations associated with financial conflicts of interest and a PI/PD's responsibilities relating to the disclosure of significant financial interests.

**Financial Conflict of Interest (FCOI):** An external financial interest of a principal investigator or project director (PI/PD) that may bias or compromise – or have the appearance of biasing or compromising – a PI/PD's judgment, objectivity, or decision-making, with respect to research/project design, conduct, or reporting.

**Principal Investigator/Project Director (PI/PD):** Refers to ANY person, regardless of title or position, responsible for the design, conduct, or reporting of research or an externally-funded project at Bradley University. This ALWAYS includes the project director or principal investigator and ANYONE named as Key Personnel, including their spouse and dependents. This may ALSO include outside collaborators (e.g., subrecipient/subaward/subcontracted persons) who meet the definition of being responsible for the design, conduct, or reporting of the research/project, and any other faculty, staff, post-doctoral fellow, students, or technicians, who satisfy the definition of being responsible for the design, conduct, or reporting of the research/project.

**Office of Sponsored Programs (OSP):** The office at Bradley University that, in collaboration with the Controller's Office, is responsible for ensuring compliance with federal conflict of interest regulations.

**Significant Financial Interest (SFI):** Refer to financial interests held by a Principal Investigator/Project Director (including their spouse and dependents) that is reasonably related to their Institutional Responsibilities.