



**University of South Florida**

**Financial Conflict of Interest  
(FCOI)**

**Training for Subrecipients**

# Purpose

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This training provides guidance regarding Subrecipient Investigators' responsibilities under the [Public Health System Objectivity in Research regulations](#) and [NSF Grantee Standards](#).



# Timing

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Federal regulations and policies require USF, as the prime applicant, to collect certain information from PHS and NSF subrecipients at the time of proposal and during the life of the award.



# Disclosure Requirements

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Subrecipient **Investigators** subject to the [USF Financial Conflict of Interest Policy](#) are required to disclose whether they or an **Immediate Family Member** have a **Significant Financial Interest** that is *directly related* to their work under the subrecipient agreement. Such disclosures must be made on Form B.

The authorized organizational official, subrecipient Principal Investigator, or consultant must submit [Form A](#). When the person submitting Form A clicks

# Review of Financial Conflicts of Interest

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At Notice of Award, the University of South Florida's Conflict of Interest Program will review each subrecipient Investigator's **Significant Financial Interest** Disclosure (Form B), determine whether a **Financial Conflict of Interest** (FCOI) exists, and if so, whether it is possible to manage the FCOI.

When a FCOI is identified, the University of South Florida will report its existence and all required details of the FCOI to the PHS awarding component as required by regulation. Or, in the case of NSF, will report to NSF if the FCOI cannot be managed.

# Significant Financial Interest: Requires Disclosure

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**Significant Financial Interest:** Any one or more of the following six types of financial interests that you or your **Immediate Family** have would be considered a Significant Financial Interest under the USF COI Policy:

1. Financial interests exceeding \$5000 in publiclytraded entities.
2. Remuneration exceeding \$5000 from a non-publically traded entity, received within the past 12 months.
3. Any equity interest in a non -publicly traded entity.
4. Income received from intellectual property rights and interests, e.g. patents, copyrights, royalties, licensing fees, etc..
5. Reimbursed or sponsored travel (for PHS-funded projects only).
6. Paid authorships including ghostwriting.

# FCOI Training Glossary of Terms

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**Financial Conflict of Interest:** A significant financial interest that could directly and significantly affect the design, conduct, or reporting of the research.

**Investigator:** The project director or principal investigator and any





# FCOI Training Glossary of Terms cont.

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**USF Research Project:** Any systematic investigation (i.e., the gathering and analysis of information), including research development, testing, and evaluation, designed to develop or contribute to generalizable knowledge, whether or not it is made available to the general public, involving a USF employee, student, or other person where the USF is responsible for the oversight and/or administration of the activity.

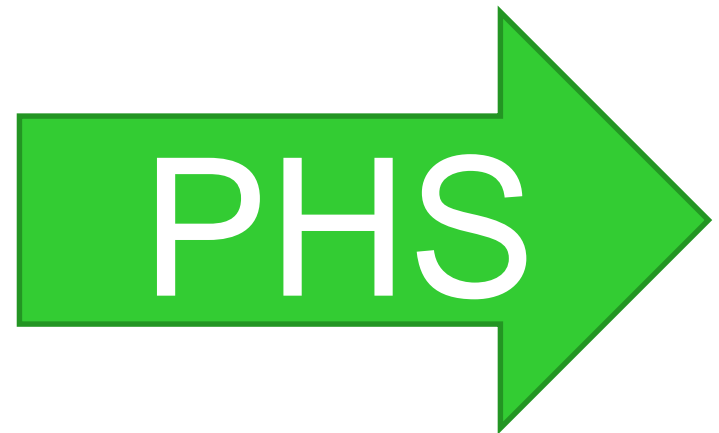
# Training Requirement

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If you are completing this training because you are a Subrecipient Investigator on an NSF proposal or award, you have completed your required training. Please complete Form B. If you have any questions, please email [coi-research@usf.edu](mailto:coi-research@usf.edu).

If you are completing this training because you are a Subrecipient Investigator on a PHS (or Other Agency) proposal or award, please continue. You need to be aware of additional federal regulations.



# Public

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# Public Accessibility to FCOI Information, cont.

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To comply with this requirement, USF's FCOI Policy [0-309](#)) dictates that USF will make certain FCOI information publicly available by responding in writing to requests for such information within five business days of receipt by the USF Conflict of Interest Program of such requests.

Public disclosures of a subrecipient **Investigator's** FCOI information will include the following information:

1. Name, title, and role of the subrecipient Investigator on the USF Research Project;
2. Name of the entity in which the SFI is held (if applicable); and
3. Nature and approximate dollar value or range of the SFI, or a statement that the value cannot be readily determined .

A list of PHS agencies and entities that follow the PHS regulation is available here: <https://www.usf.edu/research-innovation/research-integrity-compliance/ric-programs/conflict-of-interest/coi-terms.aspx>

# Training Completion

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You have completed the required training, please submit your subrecipient disclosure form using the link to Form B included in the system-generated email.

If you have any questions, please email [coi-research@usf.edu](mailto:coi-research@usf.edu)

