



Financial Conflict of Interest and Its Impact on Your Research

The Division of Research requires that all sponsored research investigators follow federal regulations, and complete a disclosure of significant financial interests (SFI).

The policy adheres to the Department of Health and Human Services requirement, which was revised two years ago, that all investigators involved in the design, conduct or reporting of research follow the disclosure rules. Only after disclosure of a SFI can the university make an informed determination about a particular activity. Only then can FAU require the appropriate oversight, limitations or prohibitions following federal, state or university regulations.

The division coordinates a faculty committee to ensure that SFI of FAU researchers (PIs, Co-PIs and key personnel) do not compromise their objectivity in:

- a) defining, conducting or reporting research activities
- b) protecting the welfare of research participants
- c) developing intellectual property.

Upon notice of award, a positive SFI disclosure will be sent with all applicable information to the Financial Conflict of Interest Committee (FCOI). Should it be determined that there is a financial conflict of interest, this conflict may be eliminated by taking any of the following steps:

- divestiture of equity interests
- termination of the relationship that gives rise to the significant financial interest (such as consulting)
- abandoning the proposal
- terminating the sponsored project
- or other similar measures.

If the investigator does not want to eliminate the conflict of interest or the appearance of that conflict and the committee determines that it can be managed, the investigator will work with the committee and the division to develop a written management plan. The plan will remain in place for as long as the grant is active or until there is a change in the investigator's SFI disclosure status.

In addition, the regulations require that researchers receive training related to conflict of interests. To that end, FAU has recently adopted the Collaborative Institutional Training Initiative (CITI) Financial Conflict of Interest training module to fulfill this requirement.

The division is phasing in the training requirements in the following manner:

- All investigators are strongly encouraged to complete the training at their earliest convenience.
- After July 1, all investigators will be encouraged to complete the required training within 30 days of their grant submissions.

After Dec. 31, all FAU investigators will need to complete the training before submitting a grant. The division's policy stipulates that completing the training is required to set up an account.

You are encouraged to contact sponsored programs or research integrity staff with questions about the requirements and to work with us as we conduct research at the highest ethical standard and while maintaining compliance with all federal, state and university regulations. Visit the [conflict of interest website](#) for more information.