

**FORM #3:**

**Financial Conflict of Interest (FCOI) Management Plan**

**Investigator Name:** \_\_\_\_\_

**Title/Position:** \_\_\_\_\_

**Department/Unit:** \_\_\_\_\_

**Project Title/Grant Number:** \_\_\_\_\_

**Funding Agency (e.g., NIH):** \_\_\_\_\_

**Date of Determination:** \_\_\_\_\_

**Designated Official:** ☐ Provost ☐ Provost's Designee ☐ CFO

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**1. Summary of Significant Financial Interest (SFI)**

- **Entity/Organization Involved:** \_\_\_\_\_
- **Nature of Interest (equity, compensation, intellectual property, travel, role, other):**

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

- **Estimated Value Range:**  
☐ \$0–\$4,999 ☐ \$5,000–\$9,999 ☐ \$10,000–\$19,999  
☐ \$20,000–\$100,000 ☐ >\$100,000
- **Relationship of SFI to NIH-Funded Research:**

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

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**2. Conflict Determination**

The Designated Official has determined that the disclosed SFI constitutes a **Financial Conflict of Interest (FCOI)** because it could directly and significantly affect the design, conduct, or reporting of NIH-funded research.

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**3. Management Strategies**

The following measures will be implemented to manage, reduce, or eliminate the FCOI. (Check all that apply and add details.)

- ☐ **Public Disclosure** of FCOI in publications, presentations, or informed consent documents.
  - ☐ **Disclosure** of FCOI to students, trainees, and collaborators.
  - ☐ **Independent Data Monitoring** by a non-conflicted faculty/staff member.
  - ☐ **Modification of Research Plan** to reduce or eliminate conflict.
  - ☐ **Restriction of Investigator's Role** in specific aspects of the project.
  - ☐ **Divestiture** of the financial interest.
  - ☐ **Severance of Relationships** with the outside entity.
  - ☐ **Other (specify):** \_\_\_\_\_
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#### 4. Monitoring Plan

- The Designated Official (or designee) will **review compliance** with the management plan at least **annually** and/or more frequently as needed.
  - Monitoring will include:
    - Periodic review of publications, presentations, or reports.
    - Verification of disclosures to students, collaborators, or human subjects.
    - Documentation of independent data review or oversight activities.
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#### 5. Investigator Obligations

The Investigator agrees to:

- Fully comply with this management plan.
  - Cooperate with the Designated Official or committee in monitoring activities.
  - Promptly disclose any new SFIs within 30 days.
  - Certify annually that compliance with the management plan has been maintained.
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#### 6. Institutional Review and Approval

**Designated Official Determination:**

- ☐ FCOI adequately managed.
- ☐ Additional measures required (describe): \_\_\_\_\_

**Investigator Acknowledgment:**

I have reviewed and agree to comply with the terms of this Management Plan.

**Investigator Signature:** \_\_\_\_\_ **Date:** \_\_\_\_\_

**Designated Official Signature:** \_\_\_\_\_ **Date:** \_\_\_\_\_

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## **7. NIH Reporting**

Cedar Crest College will report this FCOI and its management plan to NIH via the eRA Commons FCOI Module, in compliance with 42 CFR 50.605(b)(3).