

## FORM #1:

### Financial Conflict of Interest (FCOI) Quick Guide (For NIH- and other PHS-Funded Research)

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#### What Is an FCOI?

A **Financial Conflict of Interest (FCOI)** exists when a Significant Financial Interest (SFI) could **directly and significantly affect the design, conduct, or reporting of PHS/NIH-funded research.**

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#### Who Must Comply?

**All Investigators:** The Project Director (PD) or Principal Investigator (PI), and any other person, regardless of title or position, who is responsible for the **design, conduct, or reporting of research** funded by PHS/NIH or proposed for such funding. This may include, for example, collaborators or consultants. Cedar Crest College determines who is responsible for the design, conduct, or reporting of PHS/NIH-funded research based on an individual's role and level of independence, not their title.

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#### What Must Be Disclosed?

Investigators must disclose all **domestic and foreign** Significant Financial Interests (SFIs) (including those of your **spouse and dependent children**) related to your institutional responsibilities such as:

- **Equity/Ownership:**
  - Public companies: > \$5,000 in compensation + equity (past 12 months).
  - Private companies: **Any equity** or > \$5,000 compensation.
- **Intellectual Property:** e.g. royalties, licensing fees, patents, copyrights > \$5,000 (past 12 months).
- **Sponsored/Reimbursed Travel:** Any travel funded by outside entities (with limited NIH exclusions) > \$5,000 (past 12 months).
- **Leadership Roles:** Service as officer, director, or board member in outside entities.

**Examples of items not required:** Salary/benefits from Cedar Crest, royalties from scholarly work, income from U.S. government or academic panels, diversified mutual funds.

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## When Must I Disclose?

- **Before** engaging in NIH-funded research.
  - **Annually** during the award period.
  - **Within 30 days** of acquiring or discovering a new SFI.
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## Training Requirements

- **Prior to research participation.**
  - **At least every 4 years.**
  - **Immediately** if the Policy is revised, you are new to the College, or you are found noncompliant.
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## How Are Conflicts Managed?

If an FCOI is identified:

- The **Provost (or designee)** reviews disclosures. If the Provost is the Investigator, the **CFO** serves as reviewer.
  - A **Management Plan** may include: disclosure, independent monitoring, modification of role, or divestiture.
  - Compliance is **monitored annually**.
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## Reporting & Transparency

- Cedar Crest reports FCOIs to **NIH via eRA Commons** before funds are spent, annually, and within 60 days of new conflicts.
  - This policy is posted on the College website.
  - Information about FCOIs of senior/key personnel is available to the public within **5 business days** upon request.
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## Key Contacts

- **Provost / Designated Official:** [provost@cedarcrest.edu](mailto:provost@cedarcrest.edu)
- **Chief Financial Officer (if Provost is Investigator):** [finance@cedarcrest.edu](mailto:finance@cedarcrest.edu)
- **Office of Sponsored Programs / Research Support:** [grants@cedarcrest.edu](mailto:grants@cedarcrest.edu)