



UNIVERSITY OF
SAN FRANCISCO

Office of
Sponsored Programs

Financial Conflict of Interest Policy

March 2026

Policy Name

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POLICY STATEMENT

This policy is designed to align USF's existing conflict of interest (COI) procedures with current federal regulations as well as relevant state and local laws. These guidelines serve as the framework for identifying, disclosing, and managing financial conflicts of interest in research conducted at or through USF. The guidelines apply to all investigators engaged in sponsored projects and ensure compliance with federal expectations, including those set by the Public Health Service (PHS) and the National Institutes of Health (NIH). Most federal agencies' guidelines specify a disclosure threshold of \$5,000 when aggregated over a twelve-month period.

This policy reflects the requirements of the following agencies: NIH, Agency for Health Research, and other PHS agencies:

- 42 CFR Part 50 Subpart F (grants and cooperative agreements) [eCFR :: 42 CFR Part 50 Subpart F -- Promoting Objectivity in Research](#)
- 45 CFR Part 94 (contracts) Initial Regulation effective 10-1-95 [CFR-2007-title45-vol1-sec94-4.pdf](#)
- Revised Final Rule published on 8/25/11 and effective August 2012 [fcoi final rule.pdf](#)

The University of San Francisco establishes and enforces standards to ensure that the design, conduct, and reporting of all research—whether federally or non-federally funded—are free from bias resulting from investigator financial conflicts of interest or commitment. In alignment with this goal, the policy also outlines the mechanisms and procedures necessary to safeguard the integrity of the University's research when such conflicts are identified.

REASON FOR POLICY

The purpose of this policy is to safeguard the integrity, credibility, and objectivity of research conducted at the University of San Francisco by identifying, disclosing, and appropriately managing financial interests that could influence—or appear to influence—a researcher's professional judgment.

This policy ensures compliance with federal regulations, including those set forth by the Public Health Service (PHS), and promotes transparency in all stages of research: from design and conduct to reporting and oversight. It applies to any financial interest of monetary value—such as consulting fees, equity interests, intellectual property rights, gifts, or fiduciary positions—that may reasonably be perceived as affecting research outcomes. For PHS-funded researchers, reimbursed or sponsored travel is also considered a financial interest.

By requiring disclosure and implementing a structured process for review and management of potential conflicts, this policy supports the University's commitment to research excellence, public trust, and ethical accountability.

WHO SHOULD READ THIS POLICY

Any investigator who plans to participate in research at USF—regardless of the source of funding—is required to comply with the institution’s conflict of interest disclosure requirements. However, certain provisions of the policy apply specifically to investigators involved in research funded by the Public Health Service (PHS), including projects supported by the National Institutes of Health (NIH). *Note:* Phase I Small Business Innovation Research (SBIR) and Small Business Technology Transfer (STTR) programs are exempt from the PHS financial conflict of interest disclosure requirements.

FCOI must be evaluated and a determination made prior to the beginning of sponsored research. The office of sponsored programs (OSP) is required to maintain records to all investigator disclosures of financial interests and USF’s review of and response to, such disclosures (whether or not a disclosure resulted in the university determination of a FCOI) and all actions under the University’s policy for at least three years from the date the final expenditures report is submitted. Thus, If FCOI is determined, a plan must be put in place to manage the FCOI

POLICY TEXT

New Changes in the FCOI Policy

The U.S Department of Health and Human Services (HHS) has amended the Public Health Service (PHS) regulations on “Responsibility of Applicants for Promoting Objectivity in Research for which PHS Funding is Sought” ([Federal Register :: Responsibility of Applicants for Promoting Objectivity in Research for which Public Health Service Funding is Sought and Responsible Prospective Contractors](#)) and Responsible Prospective Contractors ([eCFR :: 45 CFR Part 94 -- Responsible Prospective Contractors](#)). These regulations apply to any departments receiving funds from PHS/NIH . The University of San Francisco is in compliance with the revised Federal regulation on Financial Conflict of Interest (FCOI) for grants or cooperative agreements no later than AUGUST 24, 2012 ([FCOI 2011 Web-based Tutorial - 03/20/2012](#)).

Education and Training (NIH Tutorial on Financial Conflicts of Interest):

Investigators are required to complete all mandatory training and disclose any Financial Interests related to their research to help mitigate risks associated with Significant Financial Interests (SFIs) and to assist in the management of any identified Financial Conflicts of Interest (FCOIs).

FCOI training is mandatory for all Investigators with current NIH or NSF grants awarded or modified after August 2012. This training must be completed before engaging in research

and must be renewed every four years thereafter. The FCOI training modules are available at:

https://grants.nih.gov/grants/policy/coi/tutorial2018/story_html5.html

Investigators are also responsible for the following:

- Ensuring that students, collaborators, and sub-awardees complete required disclosures and training per applicable regulations.
- Adhering to all USF policies and procedures related to FCOI.
- Ensuring compliance with all applicable laws and regulations, including certification of compliance, recordkeeping, responding to information requests, and fulfilling reporting obligations.

[FCOI Training | Grants & Funding](#)

Reporting Investigator FCOIs

[Using the eRA Commons FCOI Module for Reporting](#)

Instructions for institutional users on using the FCOI module in eRA Commons to report any identified financial conflict of interest for Investigators. Includes step-by-step instructions.

Submitting an Institutional FCOI Policy to the NIH

[Instructions for submitting an FCOI Policy into eRA Commons IPF Module](#) (10/1/2020) (PDF)

Instructions for submitting the institution's FCOI policy in the eRA Commons Institutional Profile (IPF) Module, per NIH Guide Notice [NOT-OD-21-002](#).

Disclosure of Financial Interest

PI's must disclose all domestic and international SFI's that are related to the university of San Francisco institutional responsibilities ([eCFR :: 42 CFR Part 50 -- Policies of General Applicability](#)) 50.603 Definitions [Financial Conflict of Interest | Grants & Funding](#) that are received from and/or held in an entity outside of USF.

Disclosures of Foreign Financial Interest: it is important to note disclosure of international financial interests. Investigators, including other subrecipients investigators must disclose all international financial interest including income from (seminars, lectures, or teaching

engagements, income from service on advisory committee or review panels or sponsored travel) received from any institutions of higher education or international governments (which includes local, financial or equivalent governments of another country) when such income meets the threshold for disclosure (e.g. income in excess of \$5000).

Disclose any changes to the information provided in significant financial conflict of interest form within 30 days of the change. Examples of changes that need to be reported are listed below:

- Creation of a new company
- Sponsorship of research by an outside entity
- Change in personal financial remuneration received from outside entities
- Change to unremunerated service role (i.e., serving on a board of a non-profit cooperation).
- Reimbursement for sponsored travel
- Addition of new investigators

V. Institutional Responsibilities

- Develop and implement policies and procedures that promote compliance with regulations
- Provide information to Investigators regarding the appropriate regulations, the University policy, the Investigator's role in the process and access to the relevant training.
- Ensure that the USF Financial Conflict of Interest policy is available on the OSP webpage.
- Appoint an Institutional Official to review disclosures of Significant FCOI from all investigators.
- Evaluate significant financial interests and determine any that may qualify as an FCOI.
- Meet with the Principal Investigator, if requested, to discuss the Significant Financial Interest disclosure. If there is a finding of FCOI, the Institutional Official will help the Principal Investigator to effectively manage, reduce, or eliminate the conflict.
- Gather information and supporting documentation from the Principal Investigator, if a
- Significant Financial Interest is disclosed. The Institutional Official will work collaboratively with the investigator to develop a management plan, if required, and make the plan available to the agency.
- Maintain records of financial disclosures and actions taken to resolve actual or potential Financial Conflicts of Interests for 3 years after the later of the termination of the PHS or

- National Science Foundation (NSF) [DEFINE THESE TERMS] contract, completion of the research to which such contracts relate, or the resolution of any government action involving these records.
- Provide annual FCOI reports to the appropriate agency if an FCOI exists. The report will include the status of the FCOI and how it is being managed or an explanation of why it no longer exists.
- Ensure that all proposed recipients of subawards under a PHS and/or NSF sponsored award comply with the FCOI policy. If the subrecipient does not have a publicly posted FCOI policy, they will be required to comply with USF's policy. Subrecipients are required to report FCOI to USF within 45 days of discovery; USF's Institutional Official will report it to the agency on behalf of the subrecipient.

Updates: Prior to Submission/Initiation of Research

Financial Conflict of Interest (FCOI) reports must be submitted to the Office of Sponsored Programs (OSP) before the initiation of research activities—not after the end of the project period. For ongoing projects, new FCOI disclosures should be submitted under the current active grant year.

FCOI Review Process – Conducted by the Conflict of Interest (COI) Officer (OSP)

- Step 1: The Investigator discloses any Significant Financial Interests (SFIs) and explains whether or not these interests are related to their research.
- Step 2: A Designated Official reviews the disclosure and determines whether the SFI is related to the Investigator's research. If a relationship exists, the official consults with the heads of the Department/Division/College (DLC).
- Step 3: The COI Officer collaborates with the Investigator and DLC heads to clarify the disclosed details and draft a proposed management plan. The plan is then submitted to the COI Committee.
- Step 4: The COI Committee reviews the disclosure and proposed management plan, determines whether a Financial Conflict of Interest exists, and makes a recommendation to the Institutional Official on whether the FCOI can be managed.
- Step 5: The Institutional Official makes the final decision regarding the presence of an FCOI and whether it can be appropriately managed. The COI Committee then notifies the Investigator of the determination and outlines any required next steps.

DEFINITIONS

Term	Definition
Conflict of Interest	A potential conflict of interest exists when the personal or private interests of an individual, their spouse or dependent might lead an independent observer to reasonably question whether the individual's professional actions or decisions are influenced by considerations of significant personal interest, financial or otherwise.
Significant Conflict of Interest	anything of monetary value such as salary or other payments, equity interests, and intellectual property rights. For NIH grants, OSP will require the PI and all research assistants and students to complete Financial Conflict of Interest forms to comply with the federal requirement.
Financial Conflict of Interest	A financial conflict of interest exists when the recipient's designated official(s) reasonably determines that an investigator's significant financial interest could directly and significantly affect the design, conduct, or reporting of the PHS-funded research.
Significant Financial Conflict of Interest	<p>A financial interest consisting of one or more of the following interests of the Investigator (and those of the Investigator's spouse and dependent children) that reasonably appears to be related to the Investigator's institutional responsibilities:</p> <p>With regard to any publicly traded entity, a significant financial interest exists if the value of any remuneration received from the entity in the twelve months preceding the disclosure and the value of any equity interest in the entity as of the date of disclosure, when aggregated, exceeds \$5,000. For purposes of this definition, remuneration includes salary and any payment for services not otherwise identified as salary (e.g., consulting fees, honoraria, paid authorship); equity interest includes any stock, stock option, or other ownership interest, as determined through reference to public prices or other reasonable measures of fair market value;</p> <p>With regard to any non-publicly traded entity, a significant financial interest exists if the value of any remuneration received from the entity in the twelve months preceding the disclosure, when aggregated, exceeds \$5,000, or when the Investigator (or the Investigator's spouse or dependent children) holds any equity interest (e.g., stock, stock option, or other ownership interest); or</p> <p>Intellectual property rights and interests (e.g., patents, copyrights), upon receipt of income related to such rights and interests.</p>

ADDITIONAL CONTACTS

Subject	Contact	Phone	Email
Elizabeth Donaldson	OSP Non-Financial Analyst	415-422-5222	edonaldson@usfca.edu

FORMS

Form	Use	Location
USF Financial Conflict of Interest Form Original.pdf	USF Financial Conflict of Interest Form	Laserfiche

REVISION HISTORY

03/12/2026