



**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](#).

# Applicability

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When the University of South Florida (USF) submits a proposal to the **Public Health Service (PHS) or Certain Federal Agencies, Foundations or Extramural Sponsors** or to the **National Science Foundation** naming proposed subrecipients, those subrecipients must comply with the PHS regulations regarding Objectivity in Research or NSF Grantee Standards (whichever is applicable based on the project's funding source).

# 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.

Subrecipient **Investigators** who are subject to the [USF Financial Conflict of Interest Policy](#) must complete a **Significant Financial Interest** (SFI) Disclosure:

1. Annually;
2. Within thirty (30) days of discovering or acquiring (e.g. through purchase, marriage or inheritance) a new significant financial interest; and
3. At Notice of 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 “Notify All,” an email with a link to Form B will be sent to each person listed as an Investigator on Form A. Please reference the email for your personalized Form B link.

# 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 publicly-traded 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 other person (faculty, staff, students, and collaborators or consultants outside of USF), regardless of title or position, who is responsible for the design, conduct, or reporting of a USF Research Project.

**Immediate Family Member:** Spouse, domestic partner, or dependent child.

# 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.

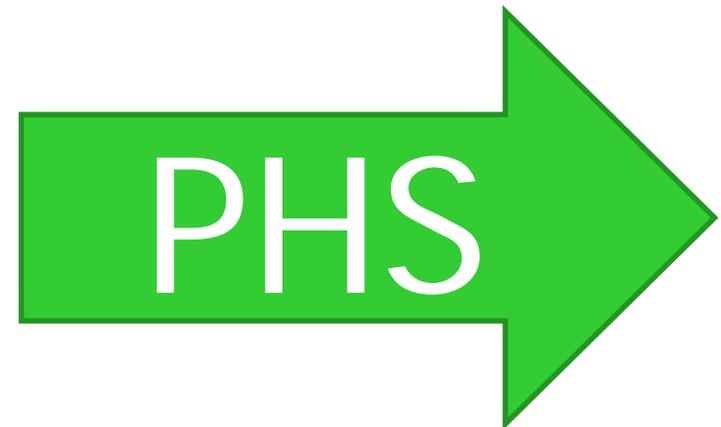
# Training Requirement

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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 Accessibility to FCOI Information

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The PHS regulation mandates that institutions receiving **Significant Financial Interest** disclosures shall, upon request, ensure public accessibility of information concerning any **Significant Financial Interest** disclosed to the recipient institution that meets the following criteria:

1. The SFI was disclosed and is still held by key personnel;
2. The institution determines that the SFI is related to the PHS-funded research; and
3. The institution determines that the SFI is a FCOI.

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>

# 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)

