UNH Financial Conflict of Interest in Research

Administrative Procedures

1. SPA Research Administration staff require FCOIR certification on proposal routing form (“yellow sheet”) before submission of proposals.
   - Refer questions on policy to RIS staff;
   - Inform PIs of location of disclosure form & instructions on the Research Office website (http://unh.edu/research/conflicts-interest-commitment) and encourage PIs to ensure all necessary disclosures are submitted before proposal is submitted;
   - For any proposals to a PHS sponsor that contain subawards, the FCOIR commitment form needs to be completed by the subawardee and returned prior to submission;
   - GCAs check list of PHS agencies and other orgs requiring compliance with PHS FCOIR regs.

2. A. Investigators without significant financial interests:
   i. For non-PHS projects, PI without significant financial interest related to the proposed research has no further responsibilities other than filing another disclosure should s/he acquire reportable financial interests.
   ii. For PHS-funded projects, disclosures that do not indicate SFI holdings by an investigator/immediate family should be forwarded to OSVPR. They will be acknowledged and filed electronically.

   All investigators on the project must completed UNH Web-based training before GCA sets up the award. Training available at https://rit.sr.unh.edu/training/rcr-training/conflict-of-interest.html. GCA sends email to PI on behalf of OSVPR requesting information about who is an “investigator” and informing him/her about training requirement. RIS will let GCA know once all listed “investigators” have completed training and okay to set up award.

   B. Investigator with significant financial interests that could possibly affect the proposed research submits a financial disclosure statement and any clarifying documentation in a sealed envelope to the SVPR prior to proposal submission.

   1) SVPR receives envelope and notifies RIS staff:
      o RIS staff conduct triage process:
        o Determine applicability of FCOIR policies (e.g., not purchasing);
        o Ensure essential information has been provided; check facts;
        o Clarify roles and relationships;
        o Make recommendation for next steps to SVPR.
      o If possible COI, notifies Director of SPA of PI name, proposal title, and agency.
      o No funds may be spent from an award until theDisclosure Review Committee (DRC) has reviewed the disclosure statement, determined whether a financial conflict of interest exists, and if so, overseen establishment of a conflict management plan, and the investigator has completed the Web-based UNH conflict of interest and commitment training. (Note that PHS requires interim action within 60 days following identification of a conflict).
      o If indication of human subjects, RIS staff notify IRB Chair.
      o SVPR convenes the DRC when it appears the proposal may be funded.
2) The DRC meets:
   o If the DRC determines a conflict exists, the PI is requested to develop and submit a draft conflict management plan; the proposed plan is finalized by the DRC in conjunction with the investigator;
   o RIS staff record and securely maintain meeting minutes;
   o RIS staff communicate meeting results with PI, plan monitors (chair and dean/dean’s designee) and Director of SPA, especially regarding status of conflict management plan;
     ➢ Director of SPA communicates with relevant GCA;
     ➢ Director of SPA communicates with sponsors when necessary, depending upon agency requirements (NIH is notified of all related conflicts, and annual reporting is required when progress report is due; NSF is notified if an NSF-related conflict cannot be managed).
   o If indication of human subjects, RIS staff communicate results to IRB Chair.

3) A. Conflict management plan and monitoring system is put into place;
   B. PI completion of Web-based training is verified;
   o Spending may commence

4) A. For PHS-funded projects, investigators must submit an updated disclosure of significant financial interests related to their institutional responsibilities at least annually (July 1-June 30).
   B. For all other sponsors, updated disclosure forms must be submitted to the SVPR if an investigator’s relevant financial situation changes.

5) For PHS-funded projects, investigators must repeat training every four years.

Acronyms:
   COI ~ Conflict of Interest
   FCOIR ~ Financial Conflict of Interest in Research
   GCA ~ Grant and Contract Administrator (in SPA)
   IRB ~ Institutional Review Board for the Protection of Human Subjects in Research
   NSF ~ National Science Foundation
   OSVPR ~ Office of the Senior Vice Provost for Research
   PI ~ Principal Investigator
   PHS ~ Public Health Service
   SFI ~ Significant Financial Interests
   SPA ~ Sponsored Programs Administration
   SVPR ~ Senior Vice Provost for Research

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