

<b>Who must disclose?</b>	<ul style="list-style-type: none"> <li>All investigators submitting proposals to or receiving an award.</li> </ul>
<b>Who is an investigator?</b>	<ul style="list-style-type: none"> <li>The Project Director or Principal Investigator and <b>any other person, regardless of title or position, who is independently responsible for the design, conduct, or reporting</b> of funded research or research proposed for funding. A rule of thumb to determine if an individual should be considered an “investigator” is if they will likely be included as an author for any publications resulting in the research.</li> <li>Examples of investigators include: <ul style="list-style-type: none"> <li>Key personnel identified in the grant application, progress report or other report submitted to the funding agency by URI.</li> <li>Personnel likely to be included as an author of reports and/or scientific journal submissions.</li> <li>Collaborator/consultants/contractor/subcontractor/sub-recipient that are responsible for design, conduct or reporting of the research.</li> <li>External advisory committee members for specific grants if they are responsible for design, conduct or reporting of the research.</li> <li>Graduate students that are responsible for design, conduct or reporting of the research.</li> </ul> </li> </ul>
<b>What must be disclosed?</b>	<ul style="list-style-type: none"> <li>Significant financial interests (SFI) related to your institutional responsibilities. See the URI Conflict of Interest in Research Policy and/or Disclosure of Significant Financial Interests Form for more information.</li> </ul>
<b>When do I disclose?</b>	<ul style="list-style-type: none"> <li>Prior to submission of a proposal for funding.</li> <li>Reviewed and updated (if necessary) prior to spending on an award.</li> <li>Annually (for PHS funded awards only)</li> <li>As new SFI’s are identified (including reimbursed travel, for PHS awards only).</li> </ul>
<b>How do I disclose?</b>	<ul style="list-style-type: none"> <li>Complete the Disclosure of Significant Financial Interests Form.</li> <li>Disclosures should be submitted to Sponsored Projects via Cayuse with the exception of new SFI and travel disclosures, which should be submitted to <a href="mailto:compliance@ds.uri.edu">compliance@ds.uri.edu</a>.</li> </ul>
<b>Who will see my information?</b>	<ul style="list-style-type: none"> <li>Staff in the Office of Research Integrity will review all disclosures.</li> <li>Disclosures indicating there may be a financial conflict of interest may be shared with the Vice President of Research and Economic Development, the Conflict of Interest Management Committee (CIMC), legal counsel, the Investigator’s department head, or other relevant individuals, administrative offices or units.</li> <li>If it is determined that a financial conflict of interest (FCOI) exists on a PHS funded award, URI is required to provide certain information to the PHS funding agency.</li> <li>If it is determined that a FCOI exists on a PHS funded award, URI is required to make certain information available to the public, upon request.</li> </ul>
<b>How is it determined if an SFI is a FCOI?</b>	<ul style="list-style-type: none"> <li>An investigator’s SFI is related to the proposed research when the Dir Research Integrity reasonably determines that the SFI could be affected by the proposed research; or is in an entity whose financial interest could be affected by the proposed research.</li> <li>An FCOI exists if CIMC reasonably determines that the SFI related to the proposed research could directly and significantly affect the design, conduct or reporting of the proposed research.</li> </ul>
<b>What if I have a FCOI?</b>	<ul style="list-style-type: none"> <li>FCOI’s must be managed, reduced or eliminated. Management plans are often used to manage risk of bias in research and allow the research to be conducted.</li> <li>Following identification of a SFI, CIMC will review and approve of a management plan or determine the FCOI is not manageable.</li> <li>Following CIMC approval, the Public Private Partnership Act (R.I.G.L. §16-59-26) requires review by the Rhode Island (RI) Board of Education and the RI Ethics Commission. Please note that this process can take a minimum of several months.</li> </ul>