



Financial Conflict of Interest FAQ

The policy on Financial Conflicts of Interest was first implemented to ensure compliance with federal regulations. All institutions that applied for and/or receive funding from agencies of the U.S. Public Health Service are required to have in place a **publicly posted Financial Conflict of Interest Policy**.

What Is Significant financial Interest

The term significant financial interest (SFI) means remuneration; equity interests; intellectual property rights and interests (e.g., patents, copyrights and royalties from such rights) reasonably related to the Investigator's institutional responsibilities, e.g., Research and/or scholarly activities, teaching and advising.

Who is required to disclose

Under the regulation, Investigators who are planning to participate in, or are participating in, federally-funded Research, are required to disclose their Significant Financial Interests (and those of his/her spouse and dependent children) that reasonably appear to be related to the Investigator's institutional responsibilities.

When do I need to report?

All Investigators involved in the design, conduct and reporting of the Research must disclose **at the time of submission** if they have any SFIs on the Routing Form and if necessary utilize the **Proposal Significant Financial Interest Disclosure Form** to provide further details.

In addition, all federally-funded Investigators will be required to update their financial conflict of interest status in an Annual Significant Financial Interest Disclosure Form. A request for these forms will be sent out to investigators in the first quarter of the fiscal year. The form should be completed within 1 week of the receipt of the initial request. If a new Significant Financial Interest is obtained, the investigator should contact the Office of Research Compliance at ric@montclair.edu within 30 days.

Does the policy require investigator training?

- At present, only PHS investigators are required to take COI training through the **Collaborative Institutional Training Initiative (CITI) Program**, although NSF investigators are encouraged to complete training since the NSF's requirements are very similar to PHS.

How do I obtain my supervisor signature?

- After you sign the form, either copy your Department Chair/Dean on the return email or send it as a separate email for their signature, asking them to return it to us.
- Alternatively, you may print it out and have your supervisor provide a physical signature.

What happens if I don't fill out the disclosure form?

Noncompliance will be reported to the Office of Sponsored Programs. Should the form be more than 60 days past due, Grants Accounting will be notified and current award spending may be paused or suspended at the discretion of the Grants Accounting Director.

I have already filled out the form before, do I need to fill it out again?

Yes, it is an annual requirement.

