
INVESTIGATOR CONFLICT OF INTEREST POLICY

Category: Research

Responsible Office: Office of Research and Sponsored Programs (ORSP)

Responsible Administrator: Associate Provost for Research Development and Administration

Date Established: 6/23/2021

Date Last Revised: 8/16/2022

Summary

All investigators (all PIs, co-PIs or Senior Personnel) who apply for, receive, plan to participate in or are participating in externally sponsored grants/projects administered by The Research Foundation for SUNY (RF) submit an annual Conflict of Interest Disclosure as described in this policy.

Policy

INVESTIGATOR CONFLICT OF INTEREST POLICY

SUNY Oswego's Investigator Conflict of Interest Policy requires that all investigators (all PIs, co-PIs or Senior Personnel) who apply for, receive, plan to participate in or are participating in externally sponsored grants/projects administered by The Research Foundation for SUNY (RF) submit an annual "Disclosure Statement of Significant Obligations (SO), Significant Financial Interests (SFI), and Sponsored Travel." The policy's intent is to remove bias or the perception of bias from the research process by identifying and managing any financial conflicts of interest. The policy defines an "Investigator" as any individual participating in the design, conduct, or reporting of a SUNY Oswego sponsored research project. Investigators should make full disclosure of all existing significant obligations and financial interests. SUNY Oswego utilizes the Collaborative Institutional Training Initiative (CITI Program) for COI training and the PACS (Pre-Award and Compliance System) Conflict of Interest (COI) system for disclosures. COI training is required for each investigator once every four years using the CITI Program, prior to completing the next COI disclosure in the PACS system. COI disclosures must be completed annually by November 1st. Guidance for using the PACS system and CITI Program training can be found at the [ORSP Pre-Award site](#). The following should be considered when completing the COI disclosure.

- Disclose any Financial Interests of you and your immediate family member within 30 days of acquiring or discovering the interest, by completing the financial disclosure form.
- Provide all necessary disclosure information annually. Annual disclosures will be in addition to any disclosures made within 30 days of your or your immediate family member's new interests being acquired or discovered.
- Provide any additional information requested as your Disclosure Certification is reviewed.
- If a Management Plan is required, your agreement to the plan must be documented prior to any funding related to your SFI (s) or SO(s) being released. If a Management Plan is in place, you are responsible for all its terms, conditions, and actions.
- You must respond to all requests for information and/or meetings regarding the institution's responsibility to monitor compliance with the plan.
- Even if you have no outside organizations or companies with which you or an immediate family member have a financial relationship you still need to complete the annual disclosure.

Additionally, all investigators must adhere to the [Conflict of Interest policy](#) for The Research Foundation for SUNY.

Investigators receiving funding from federal agencies must follow the policies governing regulatory compliance for conflict management in place at their campus (see below for PHS specific policies).

PUBLIC HEALTH SERVICE (PHS)-SPECIFIC FINANCIAL CONFLICT OF INTEREST (FCOI) POLICY

Those who apply to or hold awards with PHS-sponsored activities (i.e. NIH, etc.) must additionally follow the procedures set forth in the RF [Conflicts of Interest in Public Health Service Sponsored Programs Policy](#).

Additionally, any subaward issued by the awarding institution for a PHS-sponsored activity must address how the subrecipient will follow the FCOI policy, this can be either policy of the awardee institution or the FCOI policy of the subrecipient. All additional policies and procedures for [Subrecipient Monitoring and Management Policy](#) must be followed when issuing a subaward.

APPLICABILITY

This clarifying policy applies to all proposals and awards made to SUNY Oswego and its affiliates.

RESPONSIBILITY

Who should know this policy

- President
- Provost
- Vice Presidents and Assistant/Associate Provosts
- Deans and Associate Deans
- Department Chairs
- Faculty
- Office of Research and Sponsored Programs staff

Office of Research and Sponsored Programs (ORSP)


- Review all submitted annual conflict of interest disclosures to determine if any additional review is needed.
- Create a management plan as needed for COI disclosures where a potential conflict is disclosed.

Principal Investigator

- Complete an annual COI disclosure for all investigators who are participating in externally sponsored grants/projects administered by the RF.

- Compliance with this and all other applicable SUNY Oswego policies

Contact Information

Office of Research & Sponsored Programs (ORSP) 
State University of New York at Oswego
223 Hewitt Union
7060 State Route 104
Oswego, NY 13126-3514

Phone: (315) 312-2888
Fax: (315) 312-3177
Email: orsp@oswego.edu