University of Puget Sound
Financial Conflict of Interest Policy for Federally Sponsored Research
Flow Chart for Responsibilities of the Designated Institutional Officials in Determining Whether A Financial Conflict of Interest Exists

Note: Subrecipients must have in place their own Financial Conflict of Interest policy that complies with Federal regulations.

Pre-Grant Submission

**Conflict of Interest - COI**
Grants Manager – GM
University Counsel - UC

Investigator contacts GM to submit grant proposal/application to federal agency.

Investigator completes Financial Conflict of Interest (COI) form, which includes review of Significant Financial Interests.

GM reviews form & determines if a possible COI exists.

Yes, possible COI exists

GM notifies Provost of possible COI. Provost & GM work with the Investigator to determine if COI exists under university policy, & alert UC if a possible COI exists.

Yes, COI exists

Provost, GM & UC determine if COI can be managed under COI policy.

Non-manageable COI exists

GM informs Investigator that COI exists and cannot be managed under policy.

Grant is not submitted*

Manageable COI exists

GM notifies Investigator that COI exists and together they develop a management plan, which is sent to Provost for review & approval.

Management plan approved by Provost**

Management plan not approved by Provost

No possible COI exists

GM gathers all other grant application materials for routing.

GM circulates routing form via DocuSign to appropriate signers.

Final grant submission

Grant approved

GM instructs Investigator on how to complete financial COI training policy disclosure form, and link to CITI training module on university website.*

Investigator completes training

Investigator sends certificate of training completion for Provost & GM.

GM files & maintains with grant records.

Investigator’s annual review & confirmation of COI compliance

On an annual basis throughout the year, Investigator is responsible to monitor (1) & (2) as follows:

(1) Any discovered or acquired new Significant Financial Interest

Investigator returns COI form to GM

GM reviews form & determines if a possible COI exists.

Yes, possible COI exists

GM notifies Provost of possible COI. Provost & GM work with Investigator to determine if COI exists under university policy, & alert UC if a possible COI exists.

Yes, COI exists

Provost, GM & UC determine if COI can be managed under COI policy.

Non-manageable COI exists

GM informs Investigator that COI exists and cannot be managed under policy.

GM, with Provost’s review, must report to sponsoring agency within 60 days.

Manageable COI exists

GM notifies Investigator that COI exists and together they develop a management plan, which is sent to Provost for review & approval.

Management plan approved by Provost**

Management plan not approved by Provost

No possible COI exists

GM with Provost’s review, must report any previously unreported COIs and related management plans to sponsoring agency within 60 days.

Post-Award Grant Monitoring

On an ongoing basis throughout the year, Investigator is responsible to monitor (1) & (2) as follows:

(1) Identification of new participating Investigator

Must complete new COI form within 30 days.

GM, with Provost’s review, must report to sponsoring agency within 60 days.

(2) Identification of new participating Investigator

Must complete new COI form within 30 days.

GM, with Provost’s review, must report to sponsoring agency within 60 days.

*GM & Investigator determine if the COI can be mitigated, reduced, or eliminated through a management plan so that the research may proceed. If so, necessary changes are made to the grant application and the COI disclosure process starts over. If not, the grant application will not be submitted.

**Provost, or institutional official designated by the Provost, monitors ongoing Investigator compliance with management plan in accordance with university policy.

***GM sends reminder to complete COI training 1x every 4 years as required per 42 CF R50.604b.