

From: Michele Masucci, Ph.D., Interim Vice Provost for Research
To: Temple Research Community
Date: August 12, 2014
Re: Changes in Temple's Financial Conflict of Interest Program

The Office of the Senior Vice Provost for Research announces changes in Temple University's Financial Conflict of Interest (FCOI) disclosure program in conjunction with federal regulations and University proposal submission and review procedures. The eSPAF (electronic Sponsored Programs Approval Form) has been revised to integrate PHS and NSF requirements for external funding requests. Investigators can access information about the requirements and the University's Financial Conflict of Interest policy here: <http://www.temple.edu/research/researchadmin/coi/>.

FCOI Disclosures for PHS and NSF Proposals and Awards

Under the Public Health Service (PHS) Financial Conflict of Interest regulation effective 8/24/12, FCOI disclosures are required to be completed and reviewed annually for all PHS, including NIH, funded research. As a reminder, here is a link to all the sponsor agencies currently following the PHS regulation:
http://sites.nationalacademies.org/PGA/fdp/PGA_070596.

Temple University's FCOI program has been updated to include proposals submitted to and awards received from the National Science Foundation (NSF). Therefore, the Sponsored Programs and Projects Office will add NSF proposals and awards to their regulatory compliance review. The NSF's current ***Proposal and Award Policies and Procedures Guide*** (NSF-14-1, effective 2/24/14, http://www.nsf.gov/pubs/policydocs/pappguide/nsf14001/nsf14_1.pdf) states that an institution's Authorized Organizational Representative (AOR) is required to complete certifications stating that the organization has implemented and is enforcing a written policy on conflicts of interest (COI), consistent with the provisions of the NSF's Conflict of Interest policy; that to the best of his/her knowledge, all financial disclosures required by the COI policy were made; and that conflicts of interest, if any, were, or prior to the organization's expenditure of any funds under the award, will be, satisfactorily managed, reduced or eliminated in accordance with the organization's COI policy.

Completing the FCOI Disclosure in eRA@TU

The eRA@TU platform has been adapted to gather FCOI disclosures through development of a secure module labeled **External Interests**. Information about the disclosure form and how to complete it can be found here:
http://www.temple.edu/research/researchadmin/coi/docs/coi_investi_sv.pdf

The Sponsored Programs and Projects Office will now check for FCOI compliance for PHS and NSF-funded research. Investigators who have completed an annual FCOI disclosure have fulfilled the requirement. If a FCOI disclosure needs to be updated or renewed, or has never been completed, this must be done before proposal submission. FCOI disclosures do not need to be prepared for each new proposal submitted.

We appreciate your assistance in completing the FCOI disclosure as part of Temple's effort to meet federal regulatory requirements, as well as University policy requirements regarding disclosures for financial conflicts of interest in research.

Please direct inquiries to:

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