State University of New York at New Paltz
Procedure for compliance with PHS 2011 Conflicts of Interest regulations

The State University of New York at New Paltz adheres to the Policy on Conflicts of Interest in Public Health Service Sponsored Programs of the State University of New York (SUNY) and the Research Foundation of State University of New York (RF). This policy addresses the requirements under the revised regulation on Responsibility of Applicants for Promoting Objectivity in Research for which Public Health Service Funding Sought and Responsible Prospective Contractors, published in Federal Register, vol. 76, No. 165, on August 25, 2011.

The SUNY New Paltz Office of Sponsored Programs (OSP) will work with investigators receiving PHS funding to ensure that all requirements under the applicable Federal regulation are met by enacting the following procedures:

1. **Policy Communication**
   Copies of the SUNY/RF policy, the revised federal regulation, and this procedure document will be posted on the General Research Compliance page of the OSP website: [http://www.newpaltz.edu/sponsored_programs/researchcompliance.html](http://www.newpaltz.edu/sponsored_programs/researchcompliance.html)

   At the onset of the grant application process, OSP will inform PHS investigators of their responsibilities regarding FCOI disclosure and also provide copies of the following:
   - *Policy on Conflicts of Interest in Public Health Service Sponsored Programs (SUNY/RF PHS FCOI Policy)*
   - *Federal Regulation*
   - Significant Financial Interest (SFI) Disclosure Form
   - *Instructions for accessing CITI Financial Conflict of Interest (FCOI) training module*

2. **Designated Institutional Official**
   The Designated Institutional Official (DIO) at SUNY New Paltz will be the Vice President for Academic Affairs. The DIO is responsible for reviewing SFI disclosures, determining whether an SFI constitutes a FCOI, and developing FCOI management plans as per the SUNY/RF PHS FCOI Policy. The DIO may establish an *ad hoc* committee to assist with these responsibilities if necessary.
3. **Disclosure Submission and Review**

PHS investigators **must** complete and submit an SFI Disclosure Form to OSP at the following times: 1) Prior to the onset of the application’s institutional approval process, 2) Annually during the period of an award, and 3) Within 30 days of discovering or acquiring a new SFI.

The DIO’s approval of a PHS Institutional Approval Form will indicate that the SFI Disclosure form has been received and reviewed.

In the event that an SFI exists: If a PHS project is funded, the DIO and/or *ad hoc* committee must first determine if the SFI constitutes an FCOI. If an FCOI is present, a management plan (as described in the SUNY/RF PHS FCOI Policy) must be developed and implemented to reduce or eliminate the COI before funds can be drawn down on the award. The investigator must agree to comply with the management plan in written or recorded form. OSP will submit SFI and management plan information to the appropriate PHS agency within the necessary timeframe(s) as described in the SUNY/RF policy section V.A.7.

In the event that no SFI exists: the DIO’s office will notify the investigator (with a copy to OSP) that the disclosure form has been received and no SFI has been found.

Completed SFI Disclosure forms will be logged by the OSP Secretary in a confidential database and kept on file in the Provost’s office.

4. **Non-Compliance and Retrospective Review**

In instances of non-compliance, the DIO will conduct a retrospective review. If bias is identified, a mitigation report will be created as described by Appendix D of the SUNY/RF PHS FCOI Policy and submitted to the PHS awarding component.

5. **Required Investigator Training**

All PHS investigators must complete FCOI training:

1. prior to engaging in research;
2. every four years;
3. Immediately, if:
   a. Institution revises its FCOI policy that affects requirements of investigators
   b. An investigator is new to the institution
c. Investigator is not in compliance with the policy or management plan

SUNY New Paltz utilizes the Collaborative Institutional Training Initiative (CITI) for FCOI training. The OSP Secretary will log and track CITI COI training completion certificates as they come in. Record of course completion will be saved in a folder on the department server, and date of completion will be noted in a log in the Pre-Award Database.

After August 24th, 2012, PHS PIs must complete and pass this training prior to award setup. A passing grade for each module is 80%. OSP will verify that training is complete and up-to-date before sending a New Award Request to RF.

OSP will notify PHS Investigators of policy changes which impact Investigator requirement.

6. **Subrecipients**
   In the event that a PHS project includes subrecipients, the DIO of the subrecipient institution must indicate in their letter of commitment that all PHS investigators have submitted updated SFI disclosure forms for review. If the project is then subsequently funded, written agreements for awards to subrecipients will incorporate terms establishing whether the SUNY/RF PHS FCOI Policy or the FCOI policy of the subrecipient will apply to the subrecipient’s investigators. In either case, should the subrecipient identify any FCOI consistent with the PHS regulations, such conflict of interest must be reported to RF and/or SUNY New Paltz OSP prior to the expenditure of funds and within 45 days of identification. The SUNY New Paltz DIO and/or ad hoc committee must then review and create a management plan for the FCOI. OSP will be responsible for reporting the FCOIs to the PHS awarding agency.

7. **Public Disclosure of FCOIs**
   Public requests for SUNY New Paltz FCOI information must be made in writing to the Assistant Director for Grant Services, who will respond to such requests as described in the SUNY/RF PHS COI Policy.

8. **Recordkeeping and Reporting**
   The Office of Sponsored Programs will be responsible for all recordkeeping and reporting requirements to appropriate PHS awarding agencies.