Benjamin Rose
Financial Conflict of Interest (FCOI) Policy

POLICY: Benjamin Rose requires all individuals involved in PHS-funded research to disclose and manage any significant financial interests that could affect the design, conduct, or reporting of research, in compliance with federal regulations.

PURPOSE: The purpose of this policy is to ensure that all research funded by the Public Health Service (PHS) is conducted with integrity and free from financial conflicts of interest that could compromise the design, conduct, or reporting of research.

DEFINITION(S):

Significant Financial Interest (SFI):

A financial interest consisting of one or more of the following that reasonably appears to be related to the person's institutional responsibilities:

- Compensation (e.g., salary, consulting fees) exceeding $5,000 per year from a publicly traded or non-public entity.
- Equity interests (stock, stock options, or other ownership interests) exceeding $5,000 or representing more than 5% ownership.
- Financial interests from intellectual property related to PHS-funded research, such as patents or copyrights, when income is received.
- Third party reimbursed or sponsored travel related to their institutional responsibilities with an aggregate value per entity exceeding $5,000 during the 12-month period preceding the disclosure.
- Any other financial interest that could reasonably appear to affect research.

Conflict of Interest (COI):

A situation in which an SFI could directly and significantly affect the design, conduct, or reporting of PHS-funded research.

SCOPE: this policy applies to:

- All employees, contractors, volunteers, and collaborators who are responsible for the design, conduct, or reporting of PHS-funded research ("Key Personnel").
- All PHS-funded research conducted under the auspices of Benjamin Rose.

PROCEDURE:

1. **Disclosure Requirements**
   - Key Personnel must disclose all SFIs:
     - Prior to the start of the project
     - Annually during the project
     - Within 30 days of discovering a new SFI

- Disclosures must be submitted using the Benjamin Rose COI Disclosure Form

2. Review and Management

- The Research Integrity Officer (RIO) or designated COI Committee will review disclosures to determine if a COI exists.
- If a COI is identified, a Management Plan will be developed, which may include:
    - Public disclosure of the COI
    - Modification of the research plan
    - Monitoring of research by independent reviewers
    - Divestiture of the financial interest
    - Restriction from participation in certain research activities
- The management plan will be documented and maintained in COI records.

3. Reporting to PHS

- If a COI is identified, the organization must report to the PHS funding agency:
    - Prior to expenditure of funds
    - Annually during the project
    - At the completion of the project if the COI is ongoing

4. Record Retention

All COI disclosures and management plans will be retained for at least 3 years after the termination of the PHS award or longer if required by law.

5. Policy Review

This policy will be reviewed at least every 3 years, or sooner if required by changes in federal regulations or organizational procedures.

Approval Date: 4/2026