

PROCEDURES for Policy on Conflict of Interest in Research

Policy # 01.010.1

Effective Date: November 5, 2021; Revised: June 20, 2024

Introduction

The University's policy in Conflict of Interest in Research requires URI employees responsible for the design, conduct, or reporting of research activities (i.e., investigators) funded or proposed for funding at the University by external sources to disclose significant financial interests and abide by any decisions made by the Institutional Official on the elimination or management of the significant financial interests.

This procedure, as amended from time to time, has been established to ensure compliance with the above policy.

Questions regarding these procedures should be directed to the Associate Vice President for Research Administration at (401) 874-2636.

Procedure or Standard

Disclosing Significant Financial Interests

Investigators must complete disclosures on the Significant Financial Interest (SFI) Disclosure Form described below. Full and prompt disclosure of SFIs and reimbursed or sponsored travel is critical to URI's ability to identify, manage, and eliminate Financial Conflicts of Interest.

1. **Proposal-related Disclosures.** Prior to submitting proposals for external funding, the Investigators identified in the proposal and, if requested by the IO or the Designated Official, other Investigators associated with the proposal must disclose his or her SFIs. If the Investigator has a SFIs, the individual must provide additional information regarding the relationship of the project to the SFIs. The full disclosure must be filed prior to routing the proposal for Department, Lab or Center Head approval. Additionally, if the funding is awarded, the proposal disclosure will be verified to ensure the information is still accurate.
2. **Ad hoc Disclosures.**
 - a. When an Investigator joins a research project already in progress, an Investigator must disclose to the Designated Official on an ad hoc basis his or her SFI prior to the Investigator commencing participation in the research project.
 - b. An Investigator must disclose to the Designated Official on an ad hoc basis any new SFIs within 30 days following the date on which the SFIs is acquired or arises.
3. **Travel Disclosures.** Investigators must disclose the occurrence of any reimbursed or sponsored travel undertaken by the Investigator related to his or her Institutional Responsibilities, and URI must determine if the travel has the potential to bias funded research.

Travel disclosures must be made if travel is reimbursed or sponsored by an organization other than:

- URI
- U.S. federal, state or local governmental agencies
- U.S. institutes of higher education
- U.S. research institutes affiliated with institutes of higher education; and
- U.S. academic teaching hospitals and medical centers.

Travel disclosures must be made within 30 days following reimbursement or within 30 days following the completion of the trip if the organization or entity funds the travel directly. The travel disclosure must include

at a minimum, the purpose of the trip, the identity of the organization or entity funding the travel, the destination, the duration of the trip (usually days), and the relationship between the trip and the Investigator's proposals and awards.

Investigators may "estimate" their travel and report it in advance of the trip either on a case-by-case basis or during the annual disclosure process. The Designated Official will decide if additional information is needed to determine whether the travel constitutes a FCOI.

4. **Annual Disclosures.** For PHS funded investigators only, investigators must disclose their SFI to the Designated Official on an annual basis through the submission of a SFI Disclosure Form as part of the Noncompeting Continuation Process or other Process.

Significant Financial Interest Disclosure Form

The Significant Financial Interest Disclosure Form can be accessed through the Conflict of Interest Module in InfoEd.

To access the form, log into InfoEd (URI ID and password are required to log in).

Click on the 'Conflict of Interest' tab in the left toolbar. Click on 'Create/Update Disclosure'.

- If a disclosure form has been previously completed, select 'Edit/Submit Disclosure' to edit and submit the form.
- If a disclosure form has not been previously completed, select 'Create Initial Disclosure' to create an initial disclosure.

Exceptions

None