

LOYOLA OFFICE OF GRANTS AND SPONSORED PROGRAMS

GUIDELINES FOR DETERMINING WHETHER A FINANCIAL CONFLICT OF INTEREST EXISTS FOR PHS-FUNDED SPONSORED PROJECTS

In determining whether a significant financial interest (SFI) is related to the research and whether the SFI is a financial conflict of interest (FCOI), the designated official and/or Conflict of Interest Committee shall consider, but are not limited to, the following factors:

- Length or nature of involvement with sponsor
- Type of sponsor and sponsorship
- Estimated degree of separation between the research project activities and those of the Investigator
- Nature of the SFI
- Whether conditions of the relationship have changed
- Whether the results of the research project are likely to be affected by the SFI
- Mechanisms available or in place to assure the integrity of the research project
- Availability of alternatives to avoid the FCOI
- Risks to the rights and safety of any human subjects associated with the research
- Risks to the rights of, and obligations to, students participating in the research
- Transparency of relationships
- Forthrightness of Investigator in disclosing information
- For travel, the purpose of the travel and the possible motivations for the sponsor to fund the travel

Should the designated official and/or Conflict of Interest Committee determine that a FCOI exists, the committee shall develop a resolution plan which may include, but would not be limited to, one or more of the following:

- Disclosure of the FCOI to the public and sponsor
- Review of research protocol by independent reviewers
- Monitoring of the research project by independent reviewers
- Clear separation of research from paid activities
- Modification or disapproval of the research plan
- Divestiture of FCOI, complete or partial
- Appointment of a non-conflicted Principal Investigator
- Severance of relationships that create actual or potential FCOIs
- Disqualification of the Investigator with the FCOI from participating in all or some of the research
- Disclosure to human subjects through the consent process