# Financial Conflict of Interest (FCOI) Policy


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# I. DEFINITIONS

1. **Conflict of Interest Committee (COIC or 'Committee'):**
   The committee formed at the campus level responsible for reviewing and mitigating complicated disclosures, determining what conditions or restrictions are necessary, reviewing cases of non-compliance, and recommending sanctions as appropriate. The committee is comprised of members appointed by the provost in consultation with the appropriate dean.

   CRR 3330.015(F) states:
   'Each Campus Shall:
   1. Establish a committee to coordinate the solicitation and review of disclosures of Outside Interests from each Employee, including development of campus specific standards and procedures, determine whether a conflict of interest exists, and determine what conditions or restrictions, if any, should be imposed by the campus to Manage such conflict of interest, resolve problems revealed, and enforce sanctions as appropriate, including adoption of a Conflict-of-Interest Management Plan.
   2. Comply with all laws and regulations regarding conflict of interest, including the provision of initial and ongoing financial conflict of interest reports to the Public Health Service (PHS) as required pursuant to 42 C.F.R. Part 50 Subpart F and 45 C.F.R. Part 95.
   3. Develop and publish corresponding procedures to support implementation of this policy and any other related laws or regulations regarding conflict of interest. Such procedures shall include, at a minimum, requirements for exempt staff and faculty Employees to submit annual reports disclosing all Outside Interests or verifying the absence of any Outside Interests (except to the extent that a campus may adopt alternative procedures for adjunct faculty as provided in Section 330.015.E).'

2. **Conflict of Interest Office ('COI Office'):**
   The employees hired at each university responsible for the administrative duties of collecting and processing conflict of interest/conflict of commitment disclosures.

3. **Department of Energy (DOE)**
   The U.S. Department of Energy, the National Nuclear Security Administration (NNSA), and any components of the DOE to which the authority involved may be delegated.

4. **Financial Interest:**
   Financial interest means anything of monetary value, whether or not the value is readily ascertainable.

5. **Financial Conflict of Interest (FCOI):**
   A significant financial interest that could directly and significantly affect the design, conduct, or reporting of PHS-funded research, or a situation in which an Investigator or the Investigator's spouse or dependent children has a significant financial interest or financial relationship that could directly and significantly affect the design, conduct, reporting or funding of a project.

6. **FCOI report:**
   An Institution's report of a financial conflict of interest to a PHS Awarding Component or to the DOE program office.

7. **Health and Human Services (HHS):**
   The United States Department of Health and Human Services, and any components of the Department to which the authority involved may be delegated.

8. **Immediate Family:**
   The employee's spouse or domestic partner and dependent children.

9. **Institution/University:**
   The University of Missouri System encompassing four universities; University of Missouri-Columbia, University of Missouri- Kansas City, Missouri University of Science and Technology, and the University of Missouri St. Louis.

10. **Investigator:**
    PHS: "Investigator means the project director or principal Investigator and any other person, regardless of title or position, who is responsible for the design, conduct, or reporting of research funded by the PHS, or proposed for such funding, which may include, for example, collaborators or consultants."
    DOE: "Investigator means the principal Investigator (PI) and any other person, regardless of title or position, who is responsible for the purpose, design, conduct, or reporting of a project funded by DOE or proposed for funding by DOE. DOE program offices have the discretion to expand the definition to include also any person who participates in the purpose, design, conduct, or reporting of a project funded by DOE or proposed for funding by DOE. Such expansion will be specified in the applicable funding opportunity announcement and/or terms and conditions of the financial assistance award."
    NSF: "The term investigator means the principal investigator, co-principal investigators, and any other person at the institution who is responsible for the design, conduct, or reporting of research or educational activities funded or proposed for funding by NSF."

11. **Public Health Service (PHS):**
    The Public Health Service of the U.S. Department of Health and Human Services, and any components of the PHS to which the authority involved may be delegated, including the National Institutes of Health (NIH).

12. **PHS Awarding Component**:
    The organizational unit of the PHS that funds the research.

13. **Research**:
    A systematic investigation, study or experiment designed to develop or contribute to generalizable knowledge relating broadly to public health, including behavioral and social-sciences research. The term encompasses basic and applied research (e.g., a published article, book or book chapter) and product development (e.g., a diagnostic test or drug). As used in this subpart, the term includes any such activity for which research funding is available from a PHS Awarding Component through a grant or cooperative agreement, whether authorized under the PHS Act or other statutory authority, such as a research grant, career development award, center grant, individual fellowship award, infrastructure award, institutional training grant, program project, or research resources award.

**14. Significant Financial Interest (SFI):**

i. A financial interest consisting of one or more of the following interests of the PHS Investigator (and those of the Investigator's spouse and dependent children) that reasonably appears to be related to the Investigator's institutional responsibilities:

a) With regard to any publicly traded entity, a significant financial interest exists if the value of any remuneration received from the entity in the twelve months preceding the disclosure and the value of any equity interest in the entity as of the date of disclosure, when aggregated, exceeds $5,000. For purposes of this definition, remuneration includes salary and any payment for services not otherwise identified as salary (e.g., consulting fees, honoraria, paid authorship); equity interest includes any stock, stock option, or other ownership interest, as determined through reference to public prices or other reasonable measures of fair market value;

b) With regard to any non-publicly traded entity, a significant financial interest exists if the value of any remuneration received from the entity in the twelve months preceding the disclosure, when aggregated, exceeds $5,000, or when the Investigator (or the Investigator's spouse or dependent children) holds any equity interest (e.g., stock, stock option, or other ownership interest); or

c) Intellectual property rights and interests (e.g., patents, copyrights), upon receipt of income related to such rights and interests.

ii. Investigators also must disclose the occurrence of any reimbursed or sponsored travel (*i.e.,* that which is paid on behalf of the Investigator and not reimbursed to the Investigator so that the exact monetary value may not be readily available), related to their institutional responsibilities; provided, however, that this disclosure requirement does not apply to travel that is reimbursed or sponsored by a Federal, state, or local government agency located in the United States, a United States Institution of higher education as defined at 20 U.S.C. 1001(a), an academic teaching hospital, a medical center, or a research institute that is affiliated with a United States Institution of higher education. The Institution's FCOI policy will specify the details of this disclosure, which will include, at a minimum, the purpose of the trip, the identity of the sponsor/organizer, the destination, and the duration. In accordance with the Institution's FCOI policy, the institutional official(s) will determine if further information is needed, including a determination or disclosure of monetary value, in order to determine whether the travel constitutes an FCOI with the PHS-funded research.

iii. The term significant financial interest does not include the following types of financial interests: salary, royalties, or other remuneration paid by the Institution to the Investigator if the Investigator is currently employed or otherwise appointed by the Institution, including intellectual property rights assigned to the Institution and agreements to share in royalties related to such rights; any ownership interest in the Institution held by the Investigator, if the Institution is a commercial or for-profit organization; income from investment vehicles, such as mutual funds and retirement accounts, as long as the Investigator does not directly control the investment decisions made in these vehicles; income from seminars, lectures, or teaching engagements sponsored by a federal, state, or local government agency located in the United States, a United States Institution of higher education as defined at 20 U.S.C. 1001(a), an academic teaching hospital, a medical center, or a research institute that is affiliated with a United States Institution of higher education; or income from service on advisory committees

or review panels for a federal, state, or local government agency, an Institution of higher education as defined at 20 U.S.C. 1001(a), a United States academic teaching hospital, a medical center, or a research institute that is affiliated with a United States Institution of higher education.

**15. Small Business Innovation Research (SBIR):**
A program for small businesses that is established by the Awarding Components of the Public Health Service and certain other Federal agencies under Public Law 97-219, the Small Business Innovation Development Act, as amended. For purposes of this policy, the term SBIR Program also includes the Small Business Technology Transfer (STTR) Program, which was established by Public Law 102-564.

**16. University Responsibilities:**
Employee's responsibilities for which such Employee was hired, and which are conducted at or undertaken on behalf of the University, which may include, but is not limited to, activities such as research, research consultation, teaching, outreach/extension, professional practice, institutional committee memberships and service on University-based panels.

## II. OVERVIEW

This policy pertains to conflicts with the interests of all applicable federal grant agencies for investigators involved in new awards, new proposals, non-competing renewals, and no cost extensions including all SBIR/STTR (except phase I) subcontracts.

The UMKC Procedures on Conflict of Interest applies to all employees for Conflict of Interest and Conflict of Commitment. In some situations, employees may be required to report activities/income that are not required to be reported per the federal rule or the FCOI Policy. The conflict-of-interest form that all employees must complete captures information that is required to be disclosed under both this FOCI policy and the UMKC procedures.

**All University employees are also subject to CRR 330.015, pertaining to conflicts with the interests and commitment as it relates to their university appointment. Researchers on Human Subjects and certain University officials are also subject to CRR 410.020 pertaining to Institutional Conflicts in Human Subjects Research. In addition to the rules above, the University will follow sponsor specific mandates.**

## III. TRAINING

All Investigators are required to complete conflict of interest training regarding the FCOI Policy and the investigator's responsibility to disclose foreign and domestic SFI's, prior to engaging in any research as required by the funding agency, at least every four years, and immediately when any of the following circumstances apply:

(1) If there are revisions to the financial conflict of interest policies or procedures in any manner that affects the requirements of Investigators.

(2) An Investigator is new to the Institution or

(3) The University finds that an Investigator is not in compliance with the financial conflict of interest policy or management plan.

## IV. DISCLOSURE:

Each Investigator shall disclose financial interests (and those of the Investigator's spouse and dependent children) that reasonably appear to be related to the Investigator's institutional responsibilities no later than the time of application as required by the funding agency.

In addition, each Investigator must submit an updated disclosure of SFIs at least annually during the period of the award. Such disclosure shall include any information that was not disclosed initially, or in a subsequent disclosure of SFIs (e.g., any financial conflict of interest identified on a project that was transferred from another Institution) and shall include updated information regarding any previously disclosed SFI (e.g., the updated value of a previously disclosed equity interest).

Each Investigator participating in the research is required to submit an updated disclosure of significant financial interests within thirty (30) days of discovering or acquiring (e.g., through purchase, marriage, or inheritance) a new significant financial interest.

## WHAT IS REQUIRED TO BE DISCLOSED AS AN INVESTIGATOR

### SIGNIFICANT FINANCIAL INTERESTS:

Investigators are required to disclose financial interest(s) consisting of one or more of the following interests of the Investigator (and those of the Investigator's spouse and dependent children).

(i) With regard to any publicly traded entity, a *significant financial interest* exists if the value of any remuneration received from the entity in the twelve months preceding the disclosure and the value of any equity interest in the entity as of the date of disclosure, when aggregated, exceeds $5,000. For purposes of this definition, remuneration includes salary and any payment for services not otherwise identified as salary (e.g., consulting fees, honoraria, paid authorship); equity interest includes any stock, stock option, or other ownership interest, as determined through reference to public prices or other reasonable measures of fair market value.

(ii) With regard to any non-publicly traded entity, a *significant financial interest* exists if the value of any remuneration received from the entity in the twelve months preceding the disclosure, when aggregated, exceeds $5,000, or when the Investigator (or the Investigator's spouse or dependent children) holds any equity interest (e.g., stock, stock option, or other ownership interest); or

(iii) Intellectual property rights and interests (e.g., patents, copyrights), upon receipt of income related to such rights and interests.

(2) The term *significant financial interest* does not include the following types of financial interests: salary, royalties, or other remuneration paid by the Institution to the Investigator if the Investigator is currently employed or otherwise appointed by the Institution, including intellectual property rights assigned to the Institution and agreements to share in royalties related to such rights; any ownership interest in the Institution held by the Investigator, if the Institution is a commercial or for-profit organization; income from investment vehicles, such as mutual funds and retirement accounts, as long as the Investigator does not directly control the investment decisions made in these vehicles; income from seminars, lectures, or teaching engagements sponsored by a Federal, state, or local government agency located in the United States, a United States Institution of higher education as defined at 20 U.S.C. 1001(a), an academic teaching hospital, a medical center, or a research institute that is affiliated with a United States Institution of higher education; or income from service on advisory committees or review panels for a Federal, state, or local government agency located in the United States, a United States Institution of higher education as defined at 20 U.S.C. 1001(a), an academic teaching hospital, a medical center, or a research institute that is affiliated with a United States Institution of higher education.

### SPONSORED TRAVEL:

When an Investigator participates in any reimbursed or sponsored travel (i.e., that which is paid on behalf of the Investigator and not reimbursed to the Investigator so the exact monetary value may

not be readily available), related to their University responsibilities within 30 days of each travel occurrence; provided, however, that this disclosure requirement does not apply to travel that is reimbursed or sponsored by a federal, state, or local government agency located in the United States, an United States Institution of higher education as defined at 20 U.S.C. 1001(a), an academic teaching hospital, a medical center, or a research institute that is affiliated with an United States Institution of higher education.

The Institution will require the following elements be submitted as part of any Investigator Sponsored Travel Report:

- Purpose of the trip
- Identity of the sponsor/organizer
- Destination, and the duration
- Value of travel

The Committee will determine if further information is needed in order to determine whether the travel constitutes an FCOI with the PHS-funded research.

Investigators that are University employees are also required to disclose and follow the UMKC Procedures on Conflict of Interest to manage external relationships with their UMKC role.

## V. HOW TO DISCLOSE

All disclosures are required to be submitted through the COI module eCompliance at https://umkc.ecompliance.umsystem.edu/. This form serves as the disclosure for both MU Procedures and the FCOI Policy. The COI Office will ensure all investigators have a current disclosure on file in accordance with this policy.

## SUBRECIPENTS AND COOPERATIVE AGREEMENTS

For any research through a subrecipient (e.g., subcontractors or consortium members), the University will:

(1) Incorporate as part of a written agreement with the subrecipient terms that establish whether the financial conflicts of interest policy of the University or that of the subrecipient will apply to the subrecipient's Investigators.

> (i) If the subrecipient's Investigators must comply with the subrecipient's FCOI policy, the subrecipient will certify that its policy complies with 42 CFR, Part 50, subpart F or the funding agency's policy. If the subrecipient cannot provide such certification, the agreement shall state that subrecipient Investigators are subject to the University's FCOI policy for disclosing significant financial interests that are directly related to the subrecipient's work for the University.
>
> (ii) Additionally, if the subrecipient's Investigators must comply with the subrecipient's FCOI policy, the agreement shall specify time period(s) for the subrecipient to report all identified financial conflicts of interest to the University. Such time period(s) shall be

sufficient to enable the University to provide timely FCOI reports, as necessary, to the PHS.

(iii) If the subrecipient's Investigators must comply with the University's FCOI policy, the agreement shall specify time period(s) for the subrecipient to submit all Investigator disclosures of significant financial interests to the University. Such time period(s) shall be sufficient to enable the University to comply timely with its review, management, and reporting obligations under this policy.

2. Other Procedures as outlined in the OSPA document "Financial Conflict of Interest in PHS-Funded Research".

## VI. REVIEW AND MONITORING

The University designated individual(s) will review the disclosure for all investigators, including subrecipients subsumed by the Institution, to determine whether an Investigator's significant financial interest is related to the research and, if related, whether the significant financial interest is a Financial Conflict of Interest (FCOI).

### A. Initial Award:

The designated individual(s) shall review all Investigator disclosures for a determination of Significant Financial Interest (SFI); determine whether any SFI relates to the research and determine whether a financial conflict of interest (FCOI) exists prior to the University expenditure of any funds. An Investigator's SFI is related to the research when the designated official(s) reasonably determines that the SFI could be affected by the research or is in an entity whose financial interest could be affected by the research. The designated official(s) may involve the Investigator in its determination of whether an SFI is related to the research.

An FCOI exists when the designated official(s) reasonably determines that the SFI could directly and significantly affect the design, conduct or reporting of the research. Once an FCOI is identified, a management plan must be developed and implemented specifying the actions that have been, and shall be, taken to manage the financial conflict of interest.

### B. New Investigator and/or New Outside Interest added to a Project:

During an ongoing research project, if a new Investigator is added to the project or an existing Investigator discloses a new significant financial interest to the University, the designated official(s) will review the disclosure with in sixty days. A determination is required for whether any SFI is related to the research and whether an FCOI exists. If a determination of FCOI is made, the University will implement, on at least an interim basis, a management plan, specifying the actions that have been, and will be, taken to manage the FCOI. Depending on the nature of the significant financial interest, the University may determine that additional interim measures are necessary with regards to the Investigator's participation in the research project between the date of disclosure and the completion of the University's review.

### D. Initial reports:

Prior to authorizing the expenditure of any funds for the research project, the University shall provide to the Awarding Component an FCOI report regarding any Investigator's FCOI reporting that a management plan has been implemented in accordance with the PHS rule or the funding agency's requirements. For cases in which the University identifies a financial conflict of interest and eliminates it prior to the expenditure of funds, the University shall not submit an FCOI report to the Awarding Component.

Each University will provide the FCOI reports to the Awarding Component regarding all financial conflicts of interest of all sub-recipient Investigators consistent with this policy, i.e., prior to the expenditure of funds and within 60 days of any subsequently identified FCOI.

For any significant financial interest that the Institution identifies as conflicting subsequent to the University's initial FCOI report during an ongoing research project (e.g., upon the participation of an Investigator who is new to the research project), the University shall provide to the Awarding Component, within sixty days, an FCOI report regarding the financial conflict of interest and ensure that the University has implemented a management plan in accordance with this policy.

Pursuant to section VII of this policy, where such FCOI report involves a significant financial interest that was not disclosed timely by an Investigator or, for whatever reason, was not previously reviewed or managed by the University (e.g., was not timely reviewed or reported by a sub-recipient), the University also is required to complete a retrospective review to determine whether any of the research, or portion thereof, conducted prior to the identification and management of the financial conflict of interest was biased in the design, conduct, or reporting of such research. Additionally, pursuant to section VII of this policy, if bias is found, the University is required to promptly notify and submit a mitigation report to the Awarding Component.

**FCOI Management Plans:**

Prior to the University expenditure of any funds, the designated official(s) will ensure management of the FCOI. Examples of conditions or restrictions that might be imposed to manage a financial conflict of interest include, but are not limited to:

(i) Public disclosure of financial conflicts of interest (e.g., when presenting or publishing the research) to staff members working on the project; to the Institution's Institutional Review Board(s), Institutional Animal Care and Use Committee(s), etc;

(ii) For research projects involving human subjects research, disclosure of financial conflicts of interest directly to participants.

(iii) Appointment of an independent monitor capable of taking measures to protect the design, conduct, and reporting of the research from bias resulting from the financial conflict of interest.

(iv) Modification of the research plan.

(v) Change of personnel or personnel responsibilities, or disqualification of personnel from participation in all or a portion of the research.

(vi) Reduction or elimination of the financial interest (e.g., sale of an equity interest).

(vii) Severance of relationships that creates financial conflicts.

The University shall monitor compliance with the management plan on an ongoing basis until the completion of the research project.

All FCOI reports shall include sufficient information to enable the Awarding Component to understand the nature and extent of the financial conflict, and to assess the appropriateness of the management plan. Elements of the FCOI report shall include, but are not necessarily limited to the following:

- Project number.
- PO/Pl or Contact PD/Pl if a multiple PO/Pl model is used.
- Name of the Investigator with the financial conflict of interest.
- Name of the entity with which the Investigator has a financial conflict of interest.
- Nature of the financial interest (e.g., equity, consulting fee, travel reimbursement, honorarium).
- Value of the financial interest (dollar ranges may be used: $0-$4,999; $5,000- $9,999; $10,000-$19,999; amounts between $20,000 - $100,000, by increments of $20,000; amounts above $100,000 by increments of $50,000), or a statement that the interest is one whose value cannot be readily determined through reference to public prices or other reasonable measures of fair market value.
- A description of how the financial interest relates to the research and the basis for the determination that the financial interest conflicts with such research.
- A description of the key elements of the management plan, including:
    a) Role and principal duties of the conflicted Investigator in the research project,
    b) Conditions of the management plan,
    c) How the management plan is designed to safeguard objectivity in the research project,
    d) Confirmation of the Investigator's agreement to the management plan,
    e) How the management plan will be monitored to ensure Investigator compliance, and
    f) Other information as needed.

For any ongoing research where an FCOI was previously reported, the University shall provide to the Awarding Component an annual FCOI report that addresses the status of the FCOI and any changes to the management plan for the duration of the research project. The annual FCOI report shall specify whether the financial conflict is still being managed or explain why the FCOI no longer exists. The University shall provide annual FCOI reports to the Awarding Component for the duration of the project period (including extensions with or without funds) in the time and manner specified by the Awarding Component.

## VII. FAILURE TO DISCLOSE OR REVIEW IN A TIMELY MANNER

When a significant financial interest is not disclosed in a timely manner by an Investigator or, for

whatever reason, was not previously reviewed by the University during an ongoing research project (e.g., was not timely reviewed or reported by a sub-recipient), the Committee shall within sixty days: review the significant financial interest; determine whether it is related to research; determine whether a financial conflict of interest exists; and implement, on at least an interim basis, a management plan that shall specify the actions that have been, and will be, taken to manage such financial conflict of interest going forward. The FCOI management plan will be submitted as required.

**A. Retrospective Review**:

Whenever an FCOI is not identified or managed in a timely manner including:

- Failure by the Investigator to disclose within 30 days a SFI that is determined to constitute an FCOI.
- Failure by the University to review or manage an FCOI within sixty days: or
- Failure by the Investigator to comply with a financial conflict of interest management plan.

Within 120 days of the University's determination of noncompliance, a retrospective review of the Investigator's activities and the research project will be completed to determine whether any research, or portion thereof, conducted during the time period of the noncompliance, was biased in the design, conduct, or reporting of such research. The University will document the retrospective review.

**B. Retrospective Review Documentation:**

The review documentation will include, but is not necessarily be limited to, all of the following key elements:

- Project number
- Project title
- PD/Pl or contact PD/Pl if a multiple PD/Pl model is used
- Name of the Investigator with the FCOI
- Name of the entity with which the Investigator has a financial conflict of interest
- Reason(s) for the retrospective review
- Detailed methodology used for the retrospective review (e.g., methodology of the review process, composition of the review panel, documents reviewed)
- Findings of the review; and
- Conclusions of the review.

Based on the results of the retrospective review, if appropriate, the University will update the previously submitted FCOI report to PHS, specifying the actions that will be taken to manage the financial conflict of interest going forward.

### C. Retrospective Review, Bias Found:

If bias is found, the University is required to promptly notify and submit a mitigation report to the Awarding Component. The mitigation report must include, at a minimum, the key elements documented in the retrospective review above, a description of the impact of the bias on the research project and the plan of action or actions taken to eliminate or mitigate the effect of the bias (e.g., impact on the research project; extent of harm done, including any qualitative and quantitative data to support any actual or future harm; analysis of whether the research project is salvageable). Thereafter, the University will submit FCOI reports annually, as specified elsewhere in this policy.

Depending on the nature of the FCOI, the University may determine that additional interim measures are necessary with regards to the Investigator's participation in the research project between the date that the financial conflict of interest or the Investigator's noncompliance is determined and the completion of the retrospective review.

### D. Remedies

Any case in which the HHS determines that a PHS-funded project of clinical research whose purpose is to evaluate the safety or effectiveness of a drug, medical device, or treatment has been designed, conducted, or reported by an Investigator with a financial conflict of interest that was not managed or reported by the University as required, the University shall require the Investigator involved to disclose the financial conflict of interest in each public presentation of the results of the research and to request an addendum to previously published presentations .

## VIII. NONCOMPLIANCE

Should it come to light that a potential conflict of interest concerning an employee exists and that employee failed to disclose such potential conflict to the appropriate authority, the Director of the COI Office shall be contacted in addition to the employee's departmental chair/supervisor and dean/director. The Director shall contact the employee and request that a formal disclosure of the potential conflict be made. This request shall be copied to the employee's departmental chair/supervisor and dean/director. The Director shall also request that the employee provide specific reasons and justification for the failure to disclose. The information shall be provided to the COI Committee for review.

If an Investigator fails to comply with the management plan, the information shall be provided to the COIC for review.

The COIC has authority to recommend sanction of an employee for failure to cooperate with or upon finding a violation of COI policy (CRR 330.015.A.3). The Chancellor may apply sanctions as they deem appropriate. Possible sanctions include, but are not limited to, the following:

a) Letter of warning or admonishment.

b) Suspension or termination of research compliance committee approvals.

c) Suspension or termination of the privilege to submit sponsored activity proposals.

d) Suspension or termination of sponsored research activity spending authority.

e) Demotion or removal from assigned administrative roles.

f) Referral to the University Committee on Tenure or other appropriate committee for discipline or dismissal for cause of faculty.

g) Suspension or termination of employment (pursuant and subject to CRR 310.060, Procedures in Case of Dismissal for Cause, for those faculty covered by that rule).

## IX. APPEAL/RECONSIDERATION PROCESS:

If an employee believes the determined course of action is inappropriate, the employee may ask for the decision to be reconsidered by the full COIC by submitting a request to the Director for Conflict of Interest. Should attempts to resolve appeals in such fashion fail, procedures set forth in University of Missouri Collected Rules and Regulations 370.010 or 380.010, as applicable, will be followed.

## X. PUBLIC ACCESSIBLITY:

Prior to the University expenditure of any funds under a research project, the University shall ensure public accessibility. Such accessibility is coordinated through the University of Missouri System Custodian of Records. Following submission of a written request and via a written response to the requestor within the time frame required under Chapter 610 of the Missouri Revised Statutes (as of August 2012: three business days), information will be provided concerning any significant financial interest disclosed to the University that meets the following three criteria:

(a) The significant financial interest was disclosed and is still held by the senior/key personnel as defined by this policy

(b) The University determines that the significant financial interest is related to the research

(c) The University determines that the significant financial interest is a financial conflict of interest

The information that the University of Missouri makes available via written response to any requestor shall include, at a minimum, the following:

- The Investigator's name
- The Investigator's title and role with respect to the research project
- The name of the entity in which the significant financial interest is held
- The nature of the significant financial interest
- The approximate dollar value of the significant financial interest (dollar ranges are permissible: $0-$4,999; $5,000-9,999; $10,000 - $19,999; amounts between $20,000-$100,000 by increments of $20,000; amounts above $100,000 by increments of $50,000),

or a statement that the interest is one whose value cannot be readily determined through reference to public prices or other reasonable measures of fair market value

The University of Missouri will note in its written response that the information provided is current as of the date of the correspondence and is subject to updates, on at least an annual basis and within 60 days of the University's identification of a new financial conflict of interest, which should be requested subsequently by the requestor.

**Maintenance of Records**

The University will maintain records relating to all Investigator disclosures of financial interests and the review of, and response to, such disclosures (whether or not a disclosure resulted in a determination of an FCOI) and all actions under this policy or retrospective review, if applicable, for at least three years from the date the final expenditures report is submitted to the Awarding Component, or, where applicable, from other dates specified in 2 CFR 200.334 for different situations.

Related Policies and Regulations:

CRR 420.030,
42CFR50 Subpart F
NIH GPS 15.2.1
NIH GPS 4.1.10
UMKC Procedures for COI
National Science Foundation
DOE Policy