

Memorandum

To: University Research Community

From: Roberto M. Gutierrez, Director of Pre-Award
Division of Research

Subj.: Financial Conflict of Interest (FCOI) Requirements for Proposals Submitted to the National
Science Foundation (NSF)

Date: August 6, 2014

The Division of Research would like to remind the University Research Community of its obligations to report its outside activities and significant financial interests in accordance with FIU Policy #2370.005 at http://policies.fiu.edu/record_profile.php?id=572. That reporting must be done via the Human Resources Report of Outside Activity/Conflict of Interest web based portal at http://hr.fiu.edu/index.php?name=conflict_of_interest. Note that the research-related questions on that portal (which are located in section 1.J of the portal) have been written in such a way that all required outside activity/financial interest reporting will be captured so long as all questions are answered.

Effective, February 24, 2014, the NSF Proposal & Award Policies & Procedures Guide (PAPPG), available at http://www.nsf.gov/pubs/policydocs/pappguide/nsf14001/aag_4.jsp included an addition to the Certification Regarding Conflict of Interest (Chapter II.C.1.e, Proposal Certifications).

Previously, the NSF required institutions to report to the agency project related conflicts of interest that cannot be managed or eliminated. The revised PAPPG requires institutions to also report conflicts that are identified a posteriori, when NSF sponsored research has been conducted for which an existing conflict was not properly disclosed, identified, and managed (i.e., “research that proceeds without the imposition of conditions or restrictions when a conflict of interest exists, must be disclosed to NSF via use of the Notifications and Requests Module in FastLane”).

In order to ensure compliance with the requirements of the PAPPG the Division of Research has revised the following items:

1. Compliance Question # 18 on the ePRAF was updated to reflect that the Investigators that submit proposals to the NSF must complete the Investigator Report of Financial Interests in Research form on the DOR website before an NSF award can be released.
2. Instructions in the PHS and NSF Investigator Report of Financial Interests in Research Form (available at <http://research.fiu.edu/forms/proposal-preparation/financialInterest.pdf>) were updated to reflect the inclusion of the NSF. (The ePRAF continues to instruct researchers as to when this form is required to be included a proposal.)

DIVISION OF RESEARCH—DIRECTOR OF PRE-AWARD

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3. Subawardee Commitment Form (available at <http://research.fiu.edu/forms/proposal-preparation/subrecipientCommitmentForm.docx>) was updated to capture certifications from our proposed subawardees in regards to the NSF FCOI regulations.

If you have any questions about the Financial Conflict of Interest Requirements for Proposals Submitted to the National Science Foundation (NSF) then please feel free to contact your Pre-Award representative (<http://research.fiu.edu/dor/pages/staff-directory.html>) at 305-348-2494 for further assistance.