I. PURPOSE & INTENT

As a public institution, the University of South Florida System (USF System) has the responsibility for ensuring that all its activities, including those related to research, are carried out responsibly, and with the highest degree of integrity. An Investigator* on a USF System Research Project* may have financial interests or proprietary interests, may wish to employ a Related Person on the project, or may wish to engage in activities of an entrepreneurial nature that could pose an actual or potential Conflict of Interest* with research in which the Investigator is participating. Such conflicts are not prohibited, nor are they inherently unethical. However, these potential conflicts must be disclosed by the Investigator, reviewed by the USF System, and the conflicts managed or eliminated before the research may proceed.

The purpose of this Policy is:

- To implement the provisions of the Responsibility of Applicants for Promoting Objectivity in Research for Which Public Health Service Funding is Sought and Responsible Prospective Contractors (42 CFR Part 50 and 45 CFR Part 94) (“PHS Objectivity in Research Rule”) for research involving Investigators who are planning to participate in a USF System Research Project funded by the Public Health Service (PHS) or any other Federal agency or extramural sponsor that has adopted the PHS Objectivity in Research Rule (“PHS-Funded Investigators”*);

- To implement the provisions of the National Science Foundation’s (NSF) Grantee Standards regarding conflict of interest policies; and

- To provide a process for ensuring that any Conflict of Interest that an Investigator may have in connection with a USF System Research Project is fully disclosed, reviewed in accordance with established procedures, and satisfactorily resolved before the USF System Research Project is initiated, regardless of funding.
Investigators who have a Conflict of Interest with a USF System Research Project must comply with this policy by accessing the eCOI disclosure system at https://arc.research.usf.edu/Prod and following the procedures for disclosure of the Investigator's* interests, or those of the Investigator’s Immediate Family*.

II. INDIVIDUAL FINANCIAL RELATIONSHIPS IN FEDERALLY-FUNDED USF SYSTEM RESEARCH PROJECTS

A. Scope and Applicability. Section II applies only to Investigators* engaging in or proposing to engage in federally-funded research (“Federally-Funded Investigators*”), including Investigators engaging in research funded by agencies and extramural sponsors that have adopted the U.S. Public Health Service (PHS) Objectivity in Research Rule. If the Investigator is employed at an institution other than the USF System, or is participating in the Federally-Funded USF System Research Project* through a subcontract, subaward or other agreement, then the Investigator is a federally-funded subrecipient investigator, and subject to Section II.C.

B. Policy.

1. Investigator Disclosure. Federally-Funded Investigators must fully disclose whether they or their Immediate Family have a Significant Financial Interest* (SFI) that reasonably appears to be related to the Investigator’s Institutional Responsibilities*. Such disclosures must be made as follows:
   a. No later than the date of submission of a proposal for a Federally-Funded USF System Research Project; and
   b. Updated at the time of Notice of Award; and
   c. Within thirty (30) days of discovering or acquiring a new SFI (e.g., through purchase, marriage, or inheritance); and
   d. Annually updated during the Period of the Award* to reflect any change in the value or status of the SFI.

2. Investigator Training. Federally-Funded Investigators are required to complete training with respect to the USF System COI Policy, their responsibilities regarding disclosure of SFIs, and the PHS Objectivity in Research Rule (“COI Training”):
   a. Prior to submitting a proposal for a Federally-Funded USF System Research Project; and
   b. At least every three years, during the Period of the Award; and
c. *Immediately*, when any of the following circumstances apply:

i. The USF System revises the COI Policy for Federally-Funded Investigators or its associated procedures in any manner that affects Federally-Funded Investigator requirements; or

ii. A Federally-Funded Investigator is new to the USF System; or

iii. The USF System finds that a Federally-Funded Investigator is in noncompliance with the USF System COI Policy for Federally-Funded Investigators or a Financial Conflict of Interest (FCOI) Management Plan*.

3. **USF System Review and Management of SFI Disclosures, and FCOI Reporting.**

The USF System, through its conflict of interest review, management, and reporting process, will:

a. Determine, in consultation with the Investigator, whether any SFI disclosed is related to a USF System Research Project; and, if so

b. Determine whether the SFI constitutes a FCOI; and, if so,

c. Take appropriate action to manage the FCOI(s), including the creation of an FCOI Management Plan; and

d. For PHS-funded projects, report any so determined FCOIs and any associated FCOI Management Plans to the appropriate funding agency (in the manner directed by the funding agency), as follows:

i. *Prior to the expenditure of funds* for SFIs determined by the USF System to be a FCOI; and

ii. *Within 60 days* of any subsequently identified FCOI; and

iii. *Annually* updated during the Period of the Award in the time and manner specified by the funding agency, specifying whether the FCOI is still being managed or explaining why the FCOI no longer exists.

In those cases where the USF System identifies an FCOI related to a PHS-funded project and eliminates it prior to the expenditure of funds, the USF System shall not submit an FCOI report to the funding agency.

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1 For example, for PHS-funded research, all FCOI reports must be submitted to the NIH through the electronic Research Administration (eRA) Commons FCOI Module. See NIH Guide for Grants and Contracts, *Notice* No. NOT-OD-09-072.
e. For NSF-Funded Projects*, if a FCOI cannot be managed, reduced or eliminated, and the related research will proceed without the imposition of conditions or restrictions, the USF System will report the FCOI to the NSF Office of General Counsel in the manner directed by the funding agency.

4. **USF System FCOI Monitoring.** Once an FCOI is identified, the USF System will require that the project be monitored to ensure adherence of the Investigator to the FCOI Management Plan.

5. **USF System Review of SFIs Not Timely Disclosed or Reviewed.** Whenever the USF System identifies an SFI that was not disclosed by a Federally-Funded Investigator in accordance with the timeframes specified in Section II.B.1., or, for whatever reason, was not previously reviewed by the USF System, the USF System will, within sixty (60 days):

   a. Review the SFI and determine whether it is Related to the USF System Research Project*; and

   b. Determine whether an FCOI exists; and, if so

   c. 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 FCOI going forward.

6. **USF System Retrospective Review and Determination of Bias In Design, Conduct or Reporting of Research for PHS-Funded Projects.** If, during the course of reviewing an SFI not timely disclosed or reviewed, the USF System determines that an FCOI exists for a PHS-funded project, or if the USF System finds that a PHS-Funded Investigator* has failed to comply with an FCOI Management Plan, the USF System shall, within 120 days:

   a. Complete a Retrospective Review* of the Investigator’s activities and the project to determine whether any portion of the research was biased in the design, conduct, or reporting of such research prior to the identification and management of the FCOI or during the period of the Investigator’s noncompliance with the FCOI Management Plan; and, if so,

   b. Document the Retrospective Review, including but not limited to:

      i. Project number;

      ii. Project title;

      iii. PD/PI or contact PD/PI if a multiple PD/PI model is used;

      iv. Name of the Investigator;

      v. Entity with which the Investigator has an FCOI;
vi. Reason(s) for the Retrospective Review;

vii. Detailed methodology used for the Retrospective Review (e.g., methodology of the Retrospective Review process, composition of the Retrospective Review panel, documents reviewed);

viii. Findings of the Retrospective Review (i.e., facts and observations); and

ix. Conclusions of the Retrospective Review (i.e., determination and recommended actions).

Depending on the nature of the FCOI, the USF System may determine that additional interim measures are necessary between the date that the FCOI is identified or the date the Investigator’s noncompliance is determined and the completion of the Retrospective Review with regard to the Investigator’s participation in the USF System Research Project.

7. **Mitigation Report.** If bias is found by the USF System during the Retrospective Review under Section II.B.6., The USF System must:

a. Notify the funding agency promptly;

b. Submit a mitigation report to the funding agency, including but not limited to:
   
   i. The elements documented in Section II.B.6.;
   
   ii. A description of the impact of the bias on the USF System Research Project; and
   
   iii. The USF System’s plan of action or actions taken to eliminate or mitigate the effect of the bias (e.g., impact on the USF System Research Project; extent of harm done, including any qualitative and quantitative data to support any actual or future harm; analysis of whether the USF System Research Project is salvageable); and

c. Submit FCOI reports annually, as specified in Section II.B.3.d.

C. **Federally-Funded Subrecipient Investigators.** Where any portion of a Federally-Funded USF System Research Project is carried out through a Federally-Funded Subrecipient Investigator*, the terms of this Section II.C. will apply.

1. Where a Federally-Funded USF System Research Project is funded, in whole or in part, by a PHS agency, an entity that has adopted the PHS Objectivity in Research Rule, or by the NSF, the USF System will incorporate terms into the written agreement with the subrecipient institution that establish whether the USF System’s or the subrecipient institution’s COI Policy will apply to the Subrecipient Investigators.

   a. **Subrecipient Institution COI Policy Applies.** When the subrecipient agreement stipulates that the subrecipient institution’s COI Policy will apply, the subrecipient
institutions must also certify in the subrecipient agreement that its COI Policy complies with either the PHS Objectivity in Research Rule or the NSF’s Grantee Standards, whichever is applicable based on the prime sponsor of the USF System Research Project.

i. Time Periods for Subrecipients’ FCOI Reporting to USF System. If the USF System Research Project is PHS-Funded, the written subrecipient agreement will further specify the time period(s) within which the subrecipient institution must report all identified FCOIs to the USF System, which time period(s) shall be sufficient to enable the USF System to provide timely reporting of the FCOIs to the funding agency per Section II. B.3.

b. USF System FCOI Policy Applies. PHS- and NSF-Funded Subrecipient Investigators will be subject to the USF System COI Policy if: 1) the subrecipient agreement stipulates that the Subrecipient Investigators are subject to the USF COI Policy; or 2) the Subrecipient Investigator is not affiliated with an institution that has a COI Policy compliant with the PHS Objectivity in Research Rule or the NSF’s Grantee Standards, whichever is applicable based on the prime sponsor of the project. If the USF System COI Policy applies, the USF System will directly notify the Subrecipient Investigator(s) that the Investigator(s) is(are) subject to the USF System COI Policy and must disclose SFIs that are directly related to the Subrecipient Investigator’s work on the USF System Research Project.

i. Procedures.

a) All PHS-Funded subrecipients not registered with the Federal Demonstration Partnership Clearinghouse as having a PHS-compliant policy are required to complete USF’s Documentation of Subrecipient Financial Conflict of Interest Policy Form A, either in paper or online. Those PHS-Funded subrecipients that do not have a PHS-compliant COI policy and thus must follow the USF System COI Policy must also complete USF’s Significant Financial Interest(s) Disclosure Form B, either in paper or online.

b) All NSF-Funded subrecipients who are subject to the USF System COI Policy are required to complete USF’s Documentation of Subrecipient Financial Conflict of Interest Policy Forms A and B, either in paper or online.

ii. Time Periods for Reporting Disclosures. If PHS- or NSF-Funded Subrecipient Investigators are subject to the USF System COI Policy, the subrecipient agreement will specify the time period(s) (both initially and throughout the Period of the Award) wherein the Subrecipient Investigators will be required to disclose their SFIs that are directly related to the Investigator’s work for the USF System. Such time period(s) must be sufficient to enable the USF System to comply in a
timely manner with its review, management, and reporting obligations under Section II.B.

2. Where a Federally-Funded USF System Research Project is funded by an entity other than a PHS agency, an entity that has adopted the PHS Objectivity in Research Rule, or the NSF, the Subrecipient Investigator’s institution’s conflict of interest policy and review process will apply and any potential conflicts will not be managed by the USF System.

D. **Public Accessibility to FCOI Information for PHS-Funded Projects.** For PHS-funded projects, the USF System will make information about FCOIs it has identified through its conflict of interest review and management process publicly available by responding in writing to requests for such information within five business days of receipt by the COI Administrator of such requests. Public disclosures of a PHS-Funded Investigator’s FCOI information will include the following information:

1. Name, title, and role of the Investigator on the USF System Research Project;
2. Name of the entity in which the SFI is held (if applicable); and
3. Nature and approximate dollar value or range of the SFI, or a statement that the value cannot be readily determined.

E. **Procedures.** All Federally-Funded USF Investigators are required to disclose whether the Investigator or the Investigator’s Immediate Family have an SFI that reasonably appears to be related to their Institutional Responsibilities through the eCOI disclosure system, the procedures for which may be found at: [https://arc.research.usf.edu/Prod](https://arc.research.usf.edu/Prod).

### III. INDIVIDUAL FINANCIAL RELATIONSHIPS IN NON FEDERALLY-FUNDED USF SYSTEM RESEARCH PROJECTS

A. **Scope and Applicability.** Section III applies to an Investigator planning to participate in a non Federally-Funded USF System Research Project.

B. **Policy.** An Investigator must fully disclose whether the Investigator or the Investigator’s Immediate Family has a Significant Financial Interest or Relationship Related to a non Federally-Funded USF System Research Project. Such disclosures must be made as follows:

1. **Prior to the initiation** of a non Federally-Funded USF System Research Project; and
2. **Within thirty (30) days of discovering or acquiring a new Significant Financial Interest or Relationship** (e.g., through purchase, marriage, or inheritance); and
3. Annually updated during the Period of the Award to reflect any change in the value or status of the Significant Financial Interest or Relationship.

If the USF System determines that any Significant Financial Interest or Relationship may affect the design, conduct, or reporting of the non Federally-Funded USF System Research Project, steps will be taken to manage or eliminate the conflict. If a management plan is required in order for the non Federally-Funded USF System Research Project to proceed, then the non Federally-Funded USF System Research Project may be monitored by the USF System to ensure proper adherence to the management plan.

C. Procedures. USF Investigators are required to disclose whether the Investigator or the Investigator's Immediate Family has a Significant Financial Interest or Relationship Related to a USF System Research Project through the eCOI disclosure system, the procedures for which may be found at: https://arc.research.usf.edu/Prod.

IV. MANAGING RELATIONSHIPS IN USF SYSTEM RESEARCH PROJECTS

A. Scope and Applicability. This section applies to all Investigators, including Federally-Funded Investigators, who intend to employ a Related Person* on a USF System Research Project.

B. Policy. Employment of a Related Person on a USF System Research Project is permitted only when such employment will not involve or create a conflict of interest. Prior to the employment of a Related Person on a USF System Research Project, an Investigator must disclose the proposed employment so that it and any accompanying issues can be appropriately reviewed by the USF System to ensure that any actual or potential conflicts of interest can be managed. If it is determined that the proposed employment may affect the design, conduct, or reporting of the USF System Research Project or that it may lead to an improper personal benefit to the Investigator or the Related Person, steps will be taken to manage or eliminate the conflict before the proposed employment may occur.

C. Procedures. All USF Investigators are required to disclose proposed employment of a Related Person on a USF System Research Project in accordance with the provisions of this Policy through the eCOI disclosure system, the procedures for which may be found at: https://arc.research.usf.edu/Prod.

V. PURCHASING AND PROCUREMENT DECISIONS IN USF SYSTEM RESEARCH PROJECTS

All purchasing and procurement decisions made in the context of a USF System Research Project are subject to the USF System purchasing and procurement regulations, policies, and rules and
must be made in accordance with the State of Florida Code of Ethics for Public Officers and Employees [F.S. Chapter 112, Part III].

VI. SANCTIONS

Failure to report as required by this Policy and the related procedures may be grounds for disciplinary action under the provisions of any applicable USF System regulation, policy, or collective bargaining agreement. Failure to comply with Policy requirements may also result in the termination of current awards and ineligibility of the Investigator or the Investigator’s institution to receive future awards.

VII. FEDERAL REQUIREMENTS

This Policy fulfills the requirements of Responsibility of Applicants for Promoting Objectivity in Research for which Public Health Service Funding is Sought and Responsible Prospective Contractors (42 CFR Part 50 and 45 CFR Part 94), published in the Federal Register on August 25, 2011, and the National Science Foundation (NSF) Investigator Financial Disclosure Policy published in the Federal Register on July 11, 1995, and as may be updated from time to time. This Policy also incorporates the requirements of the Food and Drug Administration (FDA) Regulations, “Financial Disclosure by Clinical Investigators” (21 CFR Part 54; April 1, 2002). These regulations are collectively referred to in this Policy as the Federal Regulations.

VIII. RELATED USF SYSTEM POLICIES AND REGULATIONS

  

- USF System Regulation 10.107 “Faculty Ethical Obligations: Conflicts of Interest, and Outside Employment; Employment of Relatives, and Seeking or Holding Public Office.”

- USF System Policy 0-027 “Florida Code of Ethics for Public Officers and Employees: Compliance and Disclosure.”

*Current Responsible Office: Research & Innovation

*Refer to the appropriate Responsible Office website for a current name of the Vice President or other Responsible Officer.

History: New 8-30-96, Amended 2-11-05, 1-23-09, 4-4-11, 8-17-12, 5-19-14, 1-29-15, 4-13-17.
<table>
<thead>
<tr>
<th><strong>Policy 0-309</strong></th>
<th><strong>DEFINITIONS</strong></th>
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<tbody>
<tr>
<td><strong>Conflicts of Interest</strong></td>
<td>Situations in which one’s financial or personal considerations either do or have the potential to compromise or bias one’s professional judgment or objectivity. In the research context, a situation could exist where an Investigator or the Investigator’s Chair or Program Leader has financial holdings or personal interests that might reasonably appear to affect or be affected by the design, conduct, reporting, review, or oversight of a USF System Research Project. It is important to note that a conflict of interest may exist whether or not the judgment of the persons listed above is actually influenced by the secondary interest.</td>
</tr>
<tr>
<td><strong>Exempt Organization</strong></td>
<td>A federal, state, or local government agency, an Institution of higher education as defined in 20 U.S.C. 1001(a), an academic teaching hospital, a medical center, or a research institute that is affiliated with an institution of higher education. 42 CFR §50.603(2)</td>
</tr>
<tr>
<td><strong>Federally-Funded Investigator</strong></td>
<td>An Investigator who seeks or receives funding from a federal agency.</td>
</tr>
<tr>
<td><strong>Federally-Funded USF System Research Project</strong></td>
<td>A USF System Research Project for which funding is sought or received from a federal agency.</td>
</tr>
<tr>
<td><strong>Financial Conflict of Interest (FCOI)</strong></td>
<td>A Financial Conflict of Interest exists when the USF System reasonably determines that a Significant Financial Interest could directly and significantly affect the design, conduct, or reporting of a Federally-Funded USF System Research Project.</td>
</tr>
<tr>
<td><strong>FCOI Management Plan</strong></td>
<td>A management plan prepared by the COI Committee in the event an Investigator is determined to have a Financial Conflict of Interest per this USF System Policy.</td>
</tr>
<tr>
<td><strong>Immediate Family</strong></td>
<td>Spouse, domestic partner, and each dependent child.</td>
</tr>
<tr>
<td><strong>Institutional Responsibilities</strong></td>
<td>An Investigator’s professional responsibilities on behalf of the USF System, including but not limited to teaching, research, research consultation, professional practice, and USF System committee memberships.</td>
</tr>
<tr>
<td><strong>Investigator</strong></td>
<td>The project director or principal investigator and any other person (faculty, staff, students, and collaborators or consultants outside of the USF System), regardless of title or position, who is responsible for the design, conduct, or reporting of a USF</td>
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</table>
System Research Project. “Design, conduct or reporting” includes, but is not limited to:

- Designing, conducting, and/or directing a USF System Research Project.
- Applying, on behalf of the USF System, for grants or awards to perform the USF System Research Project.
- Serving as the principal investigator/program director, co-investigator, or sub-investigator.
- Enrolling research subjects (including obtaining informed consent, if applicable) or making decisions related to eligibility for enrollment.
- Analyzing, reporting, presenting, or publishing research data.

All key personnel listed on a submission for the USF System Research Project to the USF Institutional Research Board (IRB) or any other institutional review board, the USF Institutional Animal Care and Use Committee (IACUC), or the applicable Sponsored Research office are Investigators.

<table>
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<tr>
<th><strong>NSF-Funded Investigator</strong></th>
<th>An Investigator who is participating or planning to participate in a USF System Research Project funded by the National Science Foundation (NSF).</th>
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<tbody>
<tr>
<td><strong>NSF-Funded Project</strong></td>
<td>Any research or educational activity for which funding is sought or received from the National Science Foundation (NSF).</td>
</tr>
<tr>
<td><strong>Period of the Award</strong></td>
<td>The time frame of the USF System Research Project as stated in the award document, including any extensions.</td>
</tr>
<tr>
<td><strong>PHS-Funded Investigator</strong></td>
<td>An Investigator who is participating or planning to participate in a USF System Research Project Funded by Public Health Service (PHS).</td>
</tr>
<tr>
<td><strong>PHS-Funded Subrecipient Investigator</strong></td>
<td>An Investigator who is participating in a USF System Research Project Funded by Public Health Service (PHS) through a subcontract, sub-award, or other agreement.</td>
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</tbody>
</table>
| **Related to a USF System Research Project** | A Relationship or a Significant Financial Interest will be considered to be Related to the USF System Research Project in question if the Relationship or Significant Financial Interest:

  1. Could be affected by the USF System Research Project; or
  2. Is in an entity whose financial interests could be affected by the USF System Research Project. |
| **Related Person** | Persons related to each other in one of the following ways: husband; wife; parent; child; brother; sister; spouse of a child, brother, sister, or parent; or parent, child, brother, or sister of spouse; grandparent; grandchild; aunt, uncle, first cousin, niece or nephew. Related Person also includes a person who is engaged to be married to an employee or who otherwise holds himself or herself out as or is generally known as the person whom the employee intends to marry or with whom the employee intends to form a household, or any other person having the same legal residence as the USF System employee. |
| **Remuneration** | Salary and any form of payment for services not otherwise identified as salary (e.g., consulting fees, honoraria, paid authorship), including equity interests (e.g., stock, stock option, or other ownership interest, as determined through reference to public prices or other reasonable measures of fair market value). |
| **Retrospective Review** | The review conducted by the USF System of a PHS-funded project upon determining 1) that an SFI not timely disclosed or reviewed is an FCOI or 2) that a PHS-Funded Investigator has failed to comply with an FCOI Management Plan. The Retrospective Review will consist of a review of the PHS-Funded Investigator’s activities and the USF System Research Project Funded By PHS to determine whether any portion of the research was biased in the design, conduct, or reporting of such research prior to the identification and management of the FCOI or during the period of noncompliance of the PHS-Funded Investigator with the FCOI Management Plan. The Retrospective Review will be documented and will include, but not be limited to:  
   i. Project number;  
   ii. Project title;  
   iii. PD/PI or contact PD/PI if a multiple PD/PI model is used;  
   iv. Name of the PHS-Funded Investigator with the FCOI;  
   v. Entity with which the PHS-Funded Investigator has an FCOI;  
   vi. Reason(s) for the Retrospective Review; |
vii. Detailed methodology used for the Retrospective Review (e.g., methodology of the Retrospective Review process, composition of the Retrospective Review panel, documents reviewed);

viii. Findings of the Retrospective Review (i.e., facts and observations); and

ix. Conclusions of the Retrospective Review (i.e., determination and recommended actions).

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<tr>
<th><strong>Senior/Key Personnel</strong></th>
<th>The PD/PI and any other person identified as “senior/key personnel” by the USF System in the grant application, progress report, or any other report submitted to a funding agency.</th>
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| **Significant Financial Interest** | I. An opportunity for the Investigator (or his/her Immediate Family) for economic gain or an external commitment that relates to, or could reasonably be affected by, the outcome of the proposed or current USF System Research Project, including:

   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**.

   b. With regard to any *non-publicly traded entity*, a Significant Financial Interest exists:

      i. if the value of any Remuneration* received from the entity in the twelve months preceding the disclosure, when aggregated, exceeds **$5,000**, OR

      ii. when the Investigator (or the Investigator's Immediate Family) holds any equity interest (*e.g.*, stock, stock option, or other ownership interest);

   c. A position as director, officer, partner, trustee or member of board of directors of any entity related to the USF System Research Project, whether or not remuneration is received for such service; |
|-------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|

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Page 13 of 15
d. A proprietary interest in the USF System Research Project (e.g., patents, trademarks, copyrights or licensing agreements in the test article or method), and royalties of any amount from such rights, including those royalties distributed by the University. A proprietary interest is considered to be present as soon as protection is sought (e.g., upon submission of an Invention Disclosure Form to the USF Technology Transfer Office, upon filing of a patent application, etc.) a patent is granted or an option or license agreement is executed (including option and license agreements for provisional patents, patent applications, etc.).

II. For PHS-Funded Investigators only, 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 the PHS-Funded Investigator’s Institutional Responsibilities. The details of the travel disclosure will include at a minimum, the purpose of the trip, the identity of the sponsor/organizer, the destination, and the duration. The USF System 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.

III. Any other financial interest or external commitment that an Investigator believes may interfere with his or her ability to oversee or participate in research without bias.

Exclusions:
The following interests are excluded from the definition of Significant Financial Interests:

1. Salary or other Remuneration received from the USF System if the Investigator is currently employed or otherwise appointed by the USF System.

2. 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, except where the value of the
<table>
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<tr>
<th><strong>Subrecipient Investigator</strong></th>
<th>An Investigator who is not a USF System employee or student and who participates in the USF System Research Project through a subcontract, subaward, or other agreement.</th>
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<tr>
<td><strong>USF System Research Project</strong></td>
<td>Any systematic investigation (i.e., the gathering and analysis of information), including research development, testing, and evaluation, designed to develop or contribute to generalizable knowledge, whether or not it is made available to the general public, involving a USF System employee, student, or other person where the USF System is responsible for the oversight and/or administration of the activity. Activities that contribute to generalizable knowledge are those that include, but are not limited to, the following:</td>
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<td>• attempt to make comparisons or draw conclusions from the gathered data;</td>
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<td>• attempt to reach for generalizable principles of historical or social development;</td>
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<td></td>
<td>• seek underlying principles or laws of nature that have predictive value and can be applied to other circumstances for the purpose of controlling outcomes;</td>
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<td>• create general explanations about what has happened in the past; or</td>
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<td></td>
<td>• predict the future.</td>
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