

GUIDANCE MEMO NO. 13-23



Research, Grants and Contracts

DATE: June 20, 2023

TO: NKU Faculty & Staff

SUBJECT: Financial Conflict of Interest
Disclosure Process

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Purpose: This guidance provides additional details regarding an updated process of collecting the required financial conflict of interest (FCOI) disclosure associated with planned grants and contracts involving external funds.

Background: NKU has a responsibility to identify, manage, reduce, and/or eliminate research conflicts of interest and/or conflicting financial interests related to research and other extramural sponsored programs. This applies to all researchers/investigators submitting a request for external grant/contract funding through the Office of Research, Grants & Contracts (RGC).

Previous policy required a financial conflict of interest disclosure be provided for each and every funding proposal processed through the RGC office and prior to submission of each proposal. The updated policy dated May 14, 2023 now allows for the completion of only an annual financial conflict of interest disclosure to be active based on the fiscal year calendar (July 1 – June 30). At the time of proposal submission, key investigators will attest that an annual financial conflict of interest disclosure is on file and there are no changes to the records answers, and/or that they will notify the RGC within 30 calendar days of any changes in their previously recorded answers.

A new/updated annual disclosure will be required for all active grants and contracts as of July 1 of each year.

Action Requested: Faculty who plan to be or are a part of an externally funded grant or contract may complete the Annual Financial Conflict of Interest Disclosure via the Sitero Mentor compliance system [FCOI Page](#) by selecting 'My FCOI Disclosure' from the left-side menu, and clicking on the 'Create New FCOI Disclosure' button. Once completed and saved, the FCOI disclosure will remain active until June 30 of the following year or until terminated by the RGC. In the event circumstances change that warrant the review of a potential financial conflict of interest, the faculty member will then complete an 'Ad Hoc COI' for review.

Related Documents:

- [NKU Financial Conflict of Interest Disclosure](#)