

HHS PHS has established 42 CFR 50 Subpart F, “Promoting Objectivity in Research”, which is applicable to each Institution that is applying for or that receives PHS research funding and to each investigator who participates in such research. The significant differences between the PHS regulations and the Maryland State Ethics requirements in regards to conflict of interest are:

- Financial conflict of interest (FCOI) is defined as income or equity that exceeds \$5,000
- FCOI includes travel that is paid on behalf of an investigator or reimbursed by an external entity.
- A Financial Interest Report specific to the policy must be completed before submitting a proposal for funding
- A Financial Interest Report must be submitted annually
- Investigators must complete CITI Program training on the FCOI policy before initiating research
- Disclosures and FCOI management plans must be made publicly available

To be in compliance with the PHS FCOI regulations, UMCES is preparing an addendum to the existing Policy on Conflict of Interest and Conflict of Commitment implementing the regulations for the institution and for those investigators participating in PHS funded research.