Financial Conflict of Interest (FCOI) Policy for Federally Funded Investigators

Effective: September 25, 2026

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1. Introduction

Many funding agencies have requirements for disclosures of conflicts related to sponsored research. The purpose of this policy is to ensure that federally funded research is designed, conducted, and reported objectively and without bias resulting from Investigator financial conflicts of interest (FCOI).

This policy is intended to implement the regulatory requirements of Public Health Service (PHS) awarding agencies or other agencies who have adopted the PHS FCOI regulations and National Institutes of Health (NIH) guidance. These regulations include 42 CFR Part 50 Subpart F and 45 CFR Part 94, which set requirements for promoting objectivity in PHS funded research for grants, cooperative agreement, and research contracts.

Morgridge Institute for Research, Inc. ("Morgridge" or "Institute") adopts this policy for all Investigators engaged in federally funded research. It establishes processes to identify, disclose, and manage Investigator financial conflicts of interest to protect research integrity, ensure the safety of human and animal subjects, and maintain public trust in PHS/NIH and other federally supported research.

2. **Applicability**

This policy applies to individuals who meet the regulatory definition of "Investigator" (as defined below) who are engaged in or are planning to engage in federally funded research.

As described in more detail below, all outside research and business activities of Investigators that reasonably appear to be related to their Institutional Responsibilities (as defined below) must be disclosed to the Institute's Conflict of Interest Advisory Committee ("Committee"). Morgridge employees that do not meet the definition of Investigator or are not engaged in federally funded research should refer to the General Conflict of Interest Policy.

Note that some sponsors may have additional or slightly different requirements from this policy. Investigators will need to be aware of these differing areas for full compliance with any sponsor's terms. Sponsored Programs Administration and Compliance will help highlight these requirements, as needed.

3. **Definitions**

For the purpose of these policies and procedures, the following definitions apply (see also 42 CFR Part 50.603):

Conflict of Interest Advisory Committee (Committee): The minimum three member panel appointed by Morgridge to solicit and review disclosures of significant financial interests, determine FCOIs in accordance with 42 CFR 50.604(f) and this policy, and develop management plans for identified FCOI.

Federally Funded: means funding is received from US Federal government sources outside the Institute, including direct funding from a federal and federal flow-through a pass through entity grant, cooperative agreement, or contract to support research and research-related activities conducted by Institute personnel.

Financial Conflict Of Interest (FCOI): A significant financial interest (SFI) that the Institute's Committee determines is related to the federally funded research (i.e., the SFI could be affected by the research or the SFI is in an entity whose financial interest could be affected by the research) and could directly and significantly affect the design, conduct, or reporting of research supported by PHS awarding agencies or other agencies who have adopted the PHS FCOI regulations.

Financial Interest: Anything of monetary value, whether or not its value is readily ascertainable.

Institutional Responsibilities: means an Investigator's professional responsibilities on behalf of the Institute, which may include activities such as research, research consultation, teaching, professional practice, and service on Institute committees or panels.

Investigator: The Project Director (PD) or Principal Investigator (PI), and any other person, regardless of title or position, who is responsible for the design, conduct, or reporting of federally funded research or research proposed for such funding, which may include, for example, collaborators or consultants. The Institute determines who is responsible for the design, conduct, or reporting of federally funded research. Morgridge will consider the individual's role, rather than the title (e.g., senior/key personnel, faculty, MD, PHD, etc.), of those individuals involved in the research and the degree of independence in carrying out the work when determining who is responsible for the design, conduct, or reporting of the research.

Manage: means taking action to address a financial conflict of interest, which can include reducing or eliminating the financial conflict of interest, to ensure, to the extent possible, that the design, conduct, and reporting of research will be free from bias.

Research: means 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 the regulation, the term includes any such activity for which research funding is available through a grant, cooperative agreement, or contract. Research may take place within the Morgridge facility or elsewhere in conjunction with the Institute.

Senior/Key Personnel: The PD/PI and any other individual identified as senior/key personnel by the Institute in a grant application, progress report, or other submission to the funding agency. For this policy, the term applies specifically to the public accessibility requirement, which mandates disclosure only of financial conflicts of interest held by these senior/key personnel, as described in Section 9.

Significant Financial Interest (SFI):

1. A domestic or foreign financial interest consisting of one or more of the following interests of the Investigator (and those of the Investigator's spouse and dependent children) that reasonably appears to be related to the Investigator's Institutional Responsibilities performed on behalf of Morgridge, and that consists of one or more of the following:
    1. Publicly traded entity: An SFI 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 that, when aggregated, exceeds $5,000
        1. *Remuneration* includes salary and payments for services (e.g., consulting fees, honoraria, paid authorship).
        2. *Equity interest* includes stock, stock options, or other ownership interests measured by public prices or other reasonable market value.
    2. Non-publicly traded entity: An SFI 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 regardless of value; or
    3. Intellectual property: An SFI exists if receipt of income related to intellectual property rights or interests (e.g., patents, copyrights), exceeds $5,000 during the 12 months preceding the disclosure, related to such rights and interests.
2. Investigators must disclose any reimbursed or sponsored travel related to their institutional responsibilities in excess of $5,000. Such travel includes trips paid on behalf of the Investigator rather than reimbursed directly, where the exact cost may not be known. The disclosure must cover the previous 12 months and include, at minimum, the purpose, sponsor or organizer, destination, and duration of each trip.
3. The term "significant financial interest" does not include, and therefore investigators are not required to disclose, the following types of financial interests:
    - Salary, royalties, or other remuneration paid by Morgridge and/or University of Wisconsin-Madison to the Investigator if the Investigator is currently employed or otherwise appointed by Morgridge and/or University of Wisconsin-Madison, including intellectual property rights assigned to the Institute and/or Wisconsin Alumni Research Foundation and any agreements to share royalties related to those rights.
    - Income from investment vehicles such as mutual funds and retirement accounts, provided the Investigator does not directly control the investment decisions for those vehicles.
    - Income from seminars, lectures, or teaching engagements sponsored by a U.S. federal, state, or local government agency, a U.S. institution of higher education (as defined at 20 U.S.C. 1001(a)), an academic teaching hospital, a medical center, or a research institute affiliated with a U.S. institution of higher education.*
    - Income from service on advisory committees or review panels for a U.S. federal, state, or local government agency, a U.S. institution of higher education, an academic teaching hospital, a medical center, or a research institute affiliated with a U.S. institution of higher education.*
    - Travel that is reimbursed or sponsored by a U.S. federal, state, or local government agency, a U.S. institution of higher education, an academic teaching hospital, a medical center, or a research institute affiliated with a U.S. institution of higher education.*

Clarification on* **Foreign Financial Interests: Investigators must disclose all financial interests originating outside the United States, including income from seminars, lectures, teaching engagements, service on advisory committees or review panels, and reimbursed or sponsored travel, received from any foreign entity. This includes foreign institutions of higher education and foreign governments (including local or provincial governments). Disclosure is required when the aggregated amount of such income meets the threshold for disclosure (e.g., income in excess of $5,000).

4. SFI Disclosure Requirements

Investigators will disclose their SFIs that are related to their Institutional Responsibilities as defined in the policy.

The Investigator SFI Disclosures will be retained by the Institute as part of the record maintenance requirements.

Investigators are required to disclose SFIs at the following times:

A. **At the time of application/award:** Prior to any grant proposals, subaward agreements, contracts, or cooperative agreements being submitted for federal funding; and prior to the acceptance of/expenditures on federal funding awards, including supplements, carryovers, no-cost extensions, and noncompeting continuations; the PI and all other individuals who meet the definition of “Investigator” must have an up-to-date, signed Disclosure Form on file with the Committee. Sponsored Programs Administration staff will verify that a Disclosure Form is on file with the Committee.

B. **New Investigators:** If new personnel are to be added to federally funded projects who meet the definition of Investigator, they must submit a new (if no Disclosure Form is currently on file with the Committee) or updated Disclosure Form to Compliance identifying all SFI(s) promptly and before participating in the project.

C. **Annual disclosure:** All Institute personnel meeting the definition of Investigator who (1) are currently working on federally funded research as the prime awardee and/or via a subaward agreement or contract, (2) intend to submit a proposal for federal funding, or (3) intend to work under a subaward agreement or contract on an federally funded project, must submit an updated Disclosure Form at least annually.

   The annual disclosure must include: (1) any new information that was not previously disclosed to the Committee under this policy, including SFIs associated with projects transferred from another institution; and (2) updated details for any previously disclosed SFI, such as changes in the value of an equity interest. Notification will be sent out by Compliance annually to those individuals who are required to complete the Disclosure Form

D. **Ad-hoc basis during the award:** Each Investigator participating in federally funded research must submit an updated Disclosure Form within 30 days of discovering or acquiring a new SFI (e.g., through purchase, marriage, or inheritance). Updated disclosure of reimbursed or sponsored travel must also be submitted within 30 days of each occurrence.

It is the responsibility of all Investigators to ensure that their Disclosure Form on file with the Committee is up-to-date and that changes are reported within the 30-day period.

5. Review of SFI Disclosures

The Morgridge Conflict of Interest Advisory Committee (Committee) is responsible for reviewing all SFI disclosures and making determinations of FCOI. Each SFI will be evaluated in relation to every application or award on which the Investigator is responsible for the design, conduct, or reporting of research, to determine whether the SFI is related to the funded research and, if so, whether it constitutes a Financial Conflict of Interest (FCOI).

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The SFI disclosures will be reviewed as described below:

A. **Prior to award/expenditure of funds:** The Committee will review the Investigator's SFIs before the awarding agency issues a new award. If an FCOI is identified, an FCOI report will be submitted to NIH via the eRA Commons FCOI Module prior to any expenditure of funds.
B. **Annual disclosure:** As part of the annual disclosure process, Investigators must provide updated information on any previously disclosed SFIs (e.g., revised value of an equity interest). The Committee will review these updates to determine whether changes to an existing management plan are needed. Any modifications will be reflected in the next Annual FCOI report submitted to NIH, if applicable.
C. **Ad hoc basis during award period:** If a *new Investigator* joins a project or an existing Investigator acquires or discovers a *new SFI* during the project, the Committee will, within 60 days: (1) review the disclosure; (2) determine whether the SFI is related to the federally funded research; (3) determine whether an FCOI exists; and, if so, (4) implement, on at least an interim basis, a management plan.

6. FCOI Determination

The Committee is responsible for assessing the relatedness of SFIs to federally funded research and determining when they constitute an FCOI.

Relatedness Test: An SFI is considered "related" when the Committee reasonably determines that:

i. The SFI could be affected by the federally funded research, or
ii. The SFI is in an entity whose financial interests could be affected by the federally funded research.

Investigator Involvement: The Committee may consult with the Investigator when assessing whether an SFI is related to the research.

FCOI Determination: An FCOI exists when the Committee reasonably determines that the SFI could directly and significantly affect the design, conduct, or reporting of the federally funded research ("significantly" meaning that the financial interest would have a material effect on the research).

7. Management of SFIs that Pose an FCOI

When an FCOI is identified, the Committee will determine and implement management strategies to ensure the research is conducted objectively. Examples of management conditions include, but are not limited to:

1. Public disclosure of the FCOI (e.g., when presenting or publishing the research).
2. For human subjects research, disclosure of financial conflicts of interest directly to participants.
3. Appointment of an independent monitor capable of taking measures to protect the design, conduct, and reporting of the research against bias resulting from the FCOI.
4. Modification of the research plan.
5. Change of personnel or personnel responsibilities, or disqualification of personnel from participation in all or a portion of the research.
6. Reduction or elimination of the FCOI (e.g., sale of an equity interest).
7. Severance of relationships that create an actual or perceived FCOI.

The Committee will communicate the determination and the management plan in writing to the Investigator and will require the Investigator to certify compliance with the management plan.

Notification of an FCOI and its management plan will be provided to federal funding agencies per the prime award terms, conditions, and regulations. In cases where the Institute is serving as a subawardee or contractor, FCOI information and management plans will be reported to the direct funder per the subaward/contract terms, conditions, and regulations.

In cases where an FCOI is determined to exist with a project funded by a PHS Agency, the Institute must submit a formal report of the FCOI and details of the Management Plan to the applicable agency within 60 days after determining a FCOI exists and prior to expenditure of any award funds. The Committee, or designee, will submit an FCOI report to NIH via the eRA Commons FCOI Module, when applicable.

8. Monitoring Investigator Compliance

Morgridge will monitor Investigator compliance with the management plan for the duration of the award.

When the Institute's FCOI policy applies to subrecipient Investigators, Morgridge will monitor subrecipient Investigator compliance with the management plan.

As part of this monitoring process, the Committee may request and review documentation demonstrating compliance with required FCOI disclosures, including publications, presentation materials, abstracts, posters, and written communications to study personnel. Investigators must provide copies of such materials, including relevant emails or other written disclosures, to the Committee for recordkeeping. These records will be maintained to document compliance with the management plan and to support institutional review and audit activities.

9. Public Accessibility of the FCOI Policy and FCOIs Held by Senior/Key Personnel

FCOI Policy: A copy of this FCOI policy is available on Morgridge's public website at https://morgridge.org/about/contact/finance-sponsored-programs/ as required by Section 4.1.10 Financial Conflict of Interest of the NIH Grants Policy Statement.

Identified FCOIs held by Senior/Key Personnel: Before any funds are spent under an NIH award, Morgridge will ensure public accessibility, by providing a written response within five business days to requests for information about any SFI that meets all three of the following criteria:

- The SFI was disclosed, is still held by the Senior/Key Personnel.
- Morgridge has determined that the SFI is related to the PHS-funded research.
- Morgridge has determined that the SFI constitutes an FCOI.

When applicable, Morgridge will make available at least the following information:

- Investigator's name
- Investigator's title and role with respect to the research project
- Name of the entity in which the SFI is held
- Nature of the SFI
- Approximate dollar value of the SFI in the following ranges: $0–$4,999; $5,000–$9,999; $10,000–$19,999; amounts between $20,000 and $100,000 by increments of $20,000; amounts above $100,000 by increments of $50,000; or a statement that the value cannot be readily determined by public prices or reasonable fair market value measures

The written response will note 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 Institute's identification of a new FCOI.

10. Reporting Identified FCOI

Prior to spending any funds under a federally funded award, Morgridge will report identified FCOI to the appropriate funding agency per their required protocol. For example prior to spending any funds under an NIH-funded award, Morgridge will submit an identified FCOI report to NIH, in accordance with the FCOI regulations, for any Investigator's SFI determined to be an FCOI. Morgridge will also ensure that the Investigator has agreed to and begun implementing the associated management plan.

Morgridge will designate an institutional official to act as the FCOI Officer in the eRA Commons FCOI Module. The FCOI Officer is authorized to submit FCOI reports to NIH. FCOI reports are submitted only when an award is active and an FCOI has been identified (i.e., no award means no FCOI report, and no FCOI means no FCOI report).

The NIH eRA Commons FCOI Module User Guide provides instructions for preparing and submitting FCOI reports.

The institution will submit the following types of reports as explained below:

A. **Initial (Original) FCOI Reports:** The report must include all information required under 42 CFR 50.605(b)(3).

   When an FCOI is identified, the Original Report will be submitted as described below:

   1. Prior to the expenditure of funds: If an FCOI is identified at the time a new NIH award is issued, the FCOI Officer will submit an "Original" FCOI report (2011 FCOI) through the eRA Commons FCOI Module before any funds are spent.
   2. Within 60 days of Identifying a New FCOI during the award: If an FCOI is identified during the award period (e.g., a new SFI is disclosed or a new Investigator joins the project), the Institution must submit an Original FCOI report within 60 days of identifying the FCOI.

B. **Annual FCOI Reports:** For the duration of an award, including any extensions with or without funds, the Institution must submit an annual FCOI report to NIH. This report will indicate whether each previously reported FCOI is still being managed or no longer exists and describe any changes to the management plan, if applicable.

   1. The annual report must be submitted at the same time as the Research Performance Progress Report (RPPR) or multi-year progress report, and at the time of any grant extension, following NIH guidance. NIH creates the opportunity for the FCOI Officer to submit the Annual report 75 days prior to the next budget period start date for continuation awards. NIH will notify the Institution by an email when an annual report is due.
   2. Annual FCOI reports are not required at grant closeout.

C. **Revision (or Mitigation) FCOI Reports:** After completing a retrospective review, the Institution will submit a Revision report to NIH if new information about the FCOI is discovered, or a Mitigation report if the review finds that bias has occurred.

11. Training Requirements for Investigators

Each Investigator will be informed of Morgridge's FCOI Policy and trained on their responsibility to disclose foreign and domestic SFIs under this policy and the FCOI regulation at 42 CFR Part 50 Subpart F. Training must be completed before an Investigator engages in federally funded research, at least once every four years, and promptly (as described below) when any of the following occur:

A. Morgridge revises this policy or related procedures in a way that affects Investigator requirements.

B. An Investigator is new to Morgridge under an NIH award (training must be completed before participating in the research).

C. Morgridge determines that an Investigator has not complied with this policy or with a management plan issued under it (training must be completed within 30 days as directed by the Committee).

Notification will be sent out by Compliance to those individuals who are required to complete FCOI training.

To meet the regulatory training requirements, the Institute requires Investigators to complete one of the following:

- The UW-Madison Conflict of Interest Training course and passing the quiz. Instructions can be found here. Send Compliance an email when complete.
- The NIH Training module, pass the quiz, print and retain the Completion Certificate for audit purposes. Certificate should be shared with Compliance.
- Review the NIH Virtual Seminar presentation on FCOI compliance. Send Compliance the date of completion through email for audit purposes.

12. Noncompliance with FCOI Policy

If Morgridge identifies an SFI that was not disclosed, reviewed, or managed in a timely manner, the Committee will, within 60 days: review the SFI; determine whether it is related to federally funded research; determine whether it constitutes an FCOI; and, if so, implement an interim management plan describing actions that have been and will be taken to manage the FCOI going forward. Morgridge will also submit an FCOI report to NIH via the eRA Commons FCOI Module, when applicable.

In addition, whenever an FCOI is not identified or managed in a timely manner, including:

- Failure by the Investigator to disclose an SFI that is later determined to constitute an FCOI
- Failure by the Institute to review or manage an FCOI
- Failure by the Investigator to comply with an established management plan

Morgridge will, within 120 days of identifying noncompliance:

1. Complete a retrospective review of the Investigator’s activities and the NIH-funded research to determine whether the research, or any part of it, was biased in the design, conduct, or reporting.
2. Document the retrospective review in accordance with 42 CFR 50.605(a)(3)(ii)(B). Based on the results of the retrospective review, if appropriate, the Institute shall update the previously submitted FCOI report, specifying the actions that will be taken to manage the financial conflict of interest going forward.

If bias is found, Morgridge will promptly notify NIH and submit a mitigation report as required by 42 CFR 50.605(a)(3)(iii) to NIH via the FCOI Module.

The report will include:

i. The impact of the bias on the research project, and
ii. The plan of action or corrective steps taken to eliminate or mitigate the effect of the bias.

Morgridge will thereafter submit FCOI reports annually to NIH as required by the regulations and the terms and conditions of the award. Depending on the circumstances, Morgridge may implement additional interim measures regarding the Investigator’s participation in the research until the retrospective review is complete.

If bias is not found following completion of the retrospective review, no further action will be taken unless new information is discovered that needs to be reported to the NIH. If applicable, the Institution will update an existing FCOI report to specify the actions that have been, and will be, taken to manage the FCOI going forward or update a previously submitted report information (e.g., increase in value of the SFI or add any newly identified SFIs) following the completion of the retrospective review.

13. Remedies (42 CFR 50.606)

Morgridge will take all actions required under applicable federal regulations and sponsor requirements, including conducting retrospective review, implementing mitigation measures where necessary, and notifying the sponsor when required.

If the failure of an Investigator to comply with the Institute's FCOI policy or an FCOI management plan appears to have biased the design, conduct, or reporting of the federally funded research, the Institute shall promptly notify the PHS Awarding Component of the corrective action taken or to be taken. The PHS Awarding Component will consider the situation and, as necessary, take appropriate action, or refer the matter to the Institute for further action, which may include directions to the Institute on how to maintain appropriate objectivity in the PHS-funded research project. PHS may, for example, require institutions employing such an Investigator to enforce any applicable corrective actions prior to a PHS award or when the transfer of a PHS grant(s) involves such an Investigator.

In addition, the PHS Awarding Component and/or the US Department of Health and Human Services (HHS) may inquire at any time before, during, or after award into any Investigator disclosure of financial interests and the Institute's review (including any retrospective review) of, and response to, such disclosure, regardless of whether the disclosure resulted in the Institute's determination of an FCOI. The Institute will submit, or permit on site review of, all records pertinent to compliance with the regulation and this policy. To the extent permitted by law, HHS will maintain the confidentiality of all records of financial interests. On the basis of its review of records or other information that may be available, the PHS Awarding Component may decide that a particular FCOI will bias the objectivity of the PHS-funded research to such an extent that further corrective action is needed or that the Institute has not managed the FCOI in accordance with the regulation or this policy. The PHS Awarding Component may determine that imposition of specific award conditions under 2 CFR 200.208, or suspension of funding or other enforcement action under 2 CFR 200.339 is necessary until the matter is resolved.

If HHS determines that a PHS-funded clinical research project evaluating the safety or effectiveness of a drug, medical device, or treatment was designed, conducted, or reported by an Investigator with an unmanaged or unreported FCOI, the Institute will require the Investigator to disclose the conflict in every public presentation of the research results and to request an addendum to previously published presentations.

14. Subrecipient Requirements

A subrecipient relationship exists when federal funds flow from or through Morgridge to another individual or entity that will carry out a substantive portion of a PHS-funded research project and is accountable to Morgridge for programmatic outcomes and compliance.

Subrecipients are subject to Morgridge's terms and conditions. Morgridge will take reasonable steps to ensure that all subrecipient Investigators comply with the federal FCOI regulations at 42 CFR Part 50 Subpart F. Morgridge will include in each written agreement with a subrecipient terms specifying whether Morgridge's FCOI Policy or the subrecipient's own FCOI policy will apply to subrecipient Investigators (see NIH Grants Policy Statement Section15.2.1 Written Agreement).

A. **If the subrecipient's FCOI policy applies:**

The subrecipient institution must certify in the agreement that its policy complies with federal FCOI regulations. The agreement will specify the timeframe for the subrecipient to report identified FCOIs to Morgridge in time for Morgridge to meet NIH reporting deadlines (i.e., before funds are spent and within 60 days of the subrecipient identifying an FCOI). Typically, this means requiring subrecipients to report FCOIs to Morgridge within 50–55 days of identification. Morgridge's COI Committee will then submit the subrecipient FCOI report to NIH through the eRA Commons FCOI Module.

B. **If the subrecipient cannot certify compliance:**

The agreement will specify that Morgridge's FCOI Policy applies. In this case, subrecipient Investigators must disclose their SFIs to Morgridge. The SFI disclosure must include SFIs that are directly related to the subrecipient's work for Morgridge. The agreement will allow sufficient time for Morgridge to review, manage, and report any resulting FCOIs. When an FCOI is identified, Morgridge will implement a management plan, monitor compliance by the subrecipient Investigator, and submit the required FCOI report to NIH via the eRA Commons FCOI Module.

When the Institute carries out other federally funded research which includes subawardees, subcontractors, or other collaborators, the Institute will take reasonable steps to ensure that the collaborating entity has its own policies in place that meet the funding agency's conflict of interest requirements or that Investigators working for such entities follow the policies of the Institute.

15. Maintenance of Records

Morgridge will maintain records of all Investigator financial interest disclosures, Morgridge's review and response to those disclosures (whether or not they resulted in a determination of an FCOI), and any actions taken under this policy or through retrospective review. These records will be retained for at least three years from the date of submission of the final expenditures report, or for longer periods as specified in 2 CFR 200.334 for different situations. Morgridge will retain these records for each competitive segment as required by regulation.

Copies of management plans will be retained as part of the record maintenance requirements and not submitted to the NIH per NIH's FAQ guidance.

16. Other Information

If you have a question related to this policy or would like to disclose a financial interest, contact Compliance.

Responsible Office: Morgridge Executive Administration

Additional Inquiries:

- Kathi Stanek, Chief Financial and Operating Officer
- Morgridge Institute for Research
- 330 N Orchard Street Madison WI 53715
- (608) 316-4100
- spa@morgridge.org

Useful FCOI and NIH Resources:

- NIH e-mail address for FCOI-related inquiries: fcoicompliance@mail.nih.gov
- 42 CFR Part 50 Subpart F - Promoting Objectivity in Research at https://www.ecfr.gov/current/title-42/chapter-I/subchapter-D/part-50/subpart-F
- Financial Conflict of Interest at https://grants.nih.gov/policy-and-compliance/policy-topics/fcoi
- FCOI Training at https://grants.nih.gov/policy-and-compliance/policy-topics/fcoi/fcoi-training