American Geriatrics Society
Policy on Investigator's Conflicts of Interest for PHS-Funded Projects
Initial Posting: October 11, 2013
Last Reviewed: August 20, 2026

I. Purpose

This Policy applies to all research funded or proposed for funding by the Public Health Service of the U.S. Department of Health and Human Services ("PHS"), including the National Institutes of Health ("NIH"). The purpose of this policy is to implement the requirements of the federal regulations set forth in 42 CFR Part 50 (Subpart F), 45 CFR Part 94, and any additional regulations that may be in effect from time to time, governing investigators' responsibilities for promoting objectivity in PHS-Funded Research

For NIH grants and cooperative agreements, this Policy is intended to satisfy the requirements of 42 CFR Part 50, Subpart F, "Responsibility of Applicants for Promoting Objectivity in Research for which PHS Funding is Sought," and applicable NIH policies and guidance. For PHS-funded research contracts, this Policy is intended to satisfy applicable requirements of 45 CFR Part 94. Where applicable law, regulation, an NIH policy or term and condition of award imposes a more stringent requirement than this Policy, the more stringent requirement shall apply.

This Policy shall be construed in accordance with such regulations and shall be deemed to include any requirements set forth in such regulations that are not expressly set forth below.

II. Covered Parties

This Policy applies to all persons responsible for designing, conducting or reporting PHS-Funded Research under the auspices of the American Geriatrics Society ("AGS"). For NIH-funded research, "Investigator" includes the project director or principal investigator and any other person, regardless of title or position, who is responsible for the design, conduct, or reporting of NIH-funded research, or proposed for such funding. The term may include collaborators and consultants when they have such responsibilities.

III. Defined Terms

A. "Financial Conflict of Interest" ("FCOI") means a Significant Financial Interest that could directly and significantly affect the design, conduct or reporting of PHS-Funded Research. For purposes of determining whether an FCOI exists, "significantly" means that the financial interest would have a material effect on the research.

B. "Designated Official" means an institutional official designated to solicit and review disclosures of Significant Financial Interests from Investigators. The Designated Official shall be the AGS Chief Executive Officer (CEO) and/or such other individual(s) as the Institution may designate in writing. All references herein to the CEO shall be deemed to refer to such other Designated Official(s) as appropriate.

The Designated Official(s) shall have sufficient authority and responsibility to review Investigator disclosures, determine whether a Significant Financial Interest is related to PHS-Funded Research, determine whether an FCOI exists, and implement and monitor management plans.

C. "Institutional Responsibilities" means an Investigator's professional responsibilities, conducted domestically or internationally on behalf of AGS including but not limited to research, research consultation, teaching, professional practice, and administration such as service on committees, boards and panels.

D. “Investigator” means the project director or principal investigator and any other individual, regardless of title or position, who is responsible for the design, conduct, or reporting of PHS-Funded Research. This may include, for example, graduate students, post-doctoral fellows, technicians, collaborators or consultants if they have such responsibilities.

E. “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.

F. “PHS-Funded Research” means Research funded by or proposed to be funded by the PHS, including without limitation NIH awards. The term includes any Research for which funding is available from a PHS awarding component through a grant or cooperative agreement, whether authorized under the PHS Act or other statutory authority, such as a research grant, career development award, center grant, individual fellowship award, infrastructure award, institutional training grant, program project, or research resources award. For purposes of this Policy, the term shall not include Phase 1 Small Business Innovative Research (“SBIR”) or Small Business Technology Transfer (“STTR”) applications or awards.

G. "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 and product development, including development of diagnostic tests, drugs, medical devices, or other products.

H. “Senior/key personnel” means the project director or principal investigator and any other person identified as senior/key personnel by AGS in the grant application, progress report, or other report submitted to NIH under the applicable FCOI regulation.

I. “Significant Financial Interest” (“SFI”) means:

1. A financial interest consisting of one or more of the following interests of an Investigator, or the Investigator’s spouse or dependent children, that reasonably appears to be related to the Investigator’s Institutional Responsibilities:
    a. With regard to a publicly traded entity, a SFI exists if the value of any remuneration from the entity in the 12 months preceding the disclosure of the SFI and the value of any equity interest in the entity as of the date of disclosure, when aggregated, exceeds $5,000. Remuneration includes salary and any payment for services not otherwise identified as salary (e.g., consulting fees, honoraria, paid authorship fees). Equity interest includes any stock, stock option or other ownership interest, as determined through reference to public prices or other reasonable measures of fair market value.
    b. With regard to a non-publicly traded entity, a SFI exists if the value of any remuneration, as described above, received from the entity in the 12 months preceding the disclosure of the SFI, when aggregated, exceeds $5,000 or when the Investigator (or the Investigator's spouse or dependent children) holds any equity interest (e.g., stock, stock options, or other ownership interests).
    c. Intellectual property rights and interests (e.g., patents, copyrights), upon receipt of income related to such rights and interests.
    d. Reimbursed or sponsored travel related to an Investigator's Institutional Responsibilities. AGS requires disclosure of reimbursed or sponsored travel related to an

Investigator’s Institutional Responsibilities, including travel sponsored by foreign entities, unless specifically excluded below. At a minimum, each travel disclosure shall identify the purpose of the trip, the identity of the sponsor/organizer, the destination, and the duration of the trip. AGS may request the monetary value of the travel when reasonably available.

2. Exceptions. SFI does not include:
    a. Salary, royalties, or other remuneration paid by AGS to the Investigator, if the investigator is currently employed or otherwise currently holding an appointment at such institution;
    b. Intellectual property rights assigned to AGS and agreements to share in royalties related to such rights (e.g., an Investigator's royalties received under the relevant Patent Policy.)
    c. 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; and
    d. Income from seminars, lectures, teaching engagements, service on advisory committees or review panels, or travel expenses that are reimbursed or sponsored by a Federal, state, or local government agency; an institution of higher education as defined at 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, in each case to the extent permitted by applicable federal regulations. For clarity, the foregoing exception does not exclude financial interests received from a foreign institution of higher education or a foreign government when those interests otherwise meet AGS’s SFI disclosure requirements. Investigators must disclose qualifying domestic and foreign SFIs related to their Institutional Responsibilities.

IV. Policy

A. Investigator Responsibilities

This Policy requires Investigators to (i) disclose all domestic and foreign SFIs that meet the definition set forth in Section III.I, including financial interests of the Investigator’s spouse and dependent children, (ii) comply with the Review Process, and (iii) complete training with respect to PHS-Funded Research.

1. **Disclosure.** Every Investigator must disclose all domestic or foreign SFI, and those of the Investigator’s spouse and dependent children, that meet the definition of SFI in Section III.I and reasonably appear to be related to the Investigator’s Institutional Responsibilities. The Investigator is not charged with making a determination as to whether the SFI constitutes a conflict of interest or could affect the design, conduct or reporting of the PHS-Funded Research. That determination is made by a Designated Official as is further described below. Investigator disclosures are required as follows:
    a. **Upon Application.** Each Investigator who is planning to participate in PHS-Funded Research must disclose SFIs to the AGS no later than the time of application or submission of a formal proposal for the PHS-Funded Research. The disclosure shall include all qualifying SFIs held or received during the preceding twelve (12) months, as well as applicable equity interests held as of the date of disclosure.
    b. **Annually.** Each Investigator who is participating in PHS-Funded Research must submit an updated disclosure of SFIs at least annually during the period of the award. Such disclosure shall include any information that was not disclosed initially to the Institution pursuant to paragraph “a” above, or in any subsequent disclosure of SFIs, and shall include updated information regarding any previously disclosed SFI (e.g., the updated value of a previously disclosed equity interest).

c. **New SFI.** Each Investigator who is participating in PHS-Funded Research must submit a disclosure within thirty (30) days of discovering or acquiring (e.g. through purchase, marriage, or inheritance) a new SFI.
d. **Travel.** Each Investigator must disclose qualifying reimbursed or sponsored travel within thirty (30) days after each travel occurrence, unless the travel is excluded from disclosure under this Policy.
e. **Foreign Interests.** An Investigator must disclose qualifying financial interests received from foreign institutions of higher education, foreign governments, or other foreign entities when the interest meets the SFI disclosure requirements set forth in this policy.

B. Process for Reviewing Investigator Significant Financial Interests

1. **Initial Review and Action.** Before AGS disburses any funds for a PHS-Funded Research project, the Designated Official will do the following directly or acting through the Review Committee (the latter described in more detail in B(3), below):
    a. Solicit and review Investigator Significant Financial Interest ("SFI") disclosures and any other information deemed relevant (e.g. research proposal summary, IRB application, etc.). In connection with this review, the Designated Official may require the Investigator to provide additional information;
    b. Using Institutional guidelines, determine (1) whether an Investigator's SFI is related to PHS-Funded Research, and if it is, (2) whether the SFI is a Financial Conflict of Interest ("FCOI"); and
    c. Take such actions as necessary to Manage the FCOI, including development and implementation of a management plan.

    An SFI is related to PHS/NIH-funded research when AGS, through its Designated Official(s), reasonably determines that the SFI could be affected by the PHS/NIH-funded research or is in an entity whose financial interest could be affected by the research.

2. **Financial Conflict of Interest.** An Investigator's SFI is related to PHS-Funded Research when the Institution, through its Designated Official, reasonably determines that the SFI could be affected by the PHS-Funded Research or is in an entity whose financial interests could be affected by the PHS-Funded Research. A Financial Conflict of Interest exists when the Institution, through its Designated Official, reasonably determines that the SFI could directly and significantly affect the design, conduct, or reporting of the PHS-Funded Research.
3. **Review Committee on Research Conflicts of Interest ("Review Committee").** The Review Committee will be composed of the Executive Committee of the AGS Board of Directors. Designated counsel of AGS will be involved on an as-needed basis but will not be a member of the Review Committee. Only members on the Review Committee hold the right to vote. A majority of the committee members must be present to constitute a quorum. The Committee is empowered to act by majority vote of the members present at a meeting at which a quorum is present, or by written or electronic consent of a majority of all members. The Review Committee will review the facts and on a case-by-case basis determine (1) whether the Investigator's Significant Financial Interest is related to PHS-Funded Research and, if it is, (2) whether the SFI is a Financial Conflict of Interest, confirming the initial review conducted by the designated official. Investigators may be required to provide additional information. The Review Committee will prepare a report for the CEO detailing a recommended management plan, including any proposed conditions or restrictions to manage the FCOI.

4. **Decision by CEO.** If the Review Committee determines that a Financial Conflict of Interest exists, it will submit a report of its determination and recommended management plan to the CEO. The CEO may return the report to the Review Committee for clarification or supplementation, and will accept, reject or modify the Review Committee's determination and recommendation. The CEO will make a final determination in writing and specify the conditions or restrictions, if any, that should be imposed to manage the Financial Conflict of Interest. The CEO will provide copies of the final decision to the Investigator, and the responsible Institutional Review Board (if human subjects research is involved). On occasion, normally with respect to existing management plans, the CEO may provide for administrative handling, consisting of a letter that provides appropriate guidance and, if warranted, states that no additional safeguards or conditions are needed. Upon receipt of the decision, the Investigator must either acknowledge it or submit an appeal. Funding will be held until the Investigator agrees to comply with the management plan.
5. **Investigator Appeals.** The Investigator has 10 days from receipt of the CEO's final decision to submit an appeal in writing to the Society President as applicable. The appeal should include the specific provisions being challenged, the reason for the appeal, and the justification for a different outcome. The Investigator may also provide an alternative management plan and any supplemental information that might be helpful to the President in making a final determination. This decision shall be final and not further appealable.
6. **Submission of the Research Application.** The Institution will certify, as required by NIH, that AGS has in effect an up-to-date, written and enforced administrative process and policy for identifying and managing FCOI; will promote and enforce Investigator compliance; will manage FCOIs and provide required initial and ongoing reports to NIH; will make required FCOI and SFI information available to NIH upon request; and will otherwise comply with applicable federal requirements.
   AGS shall maintain its FCOI policy on its publicly accessible website and shall submit the policy to NIH through the eRA Commons Institution Profile (IPF) Module, as required by NIH. AGS shall update the policy submitted to NIH when the policy is revised.
7. **Institutional Remedies.**
   a. Investigators are required to comply with the final decision of the CEO or Society President. If an Investigator fails to comply, the CEO, with the aid of the Review Committee, will develop a corrective action plan for final review and approval by the Society President
   b. The Institution may impose sanctions for non-compliance including suspension, denial of eligibility to engage in Research, or other appropriate penalties. Such sanctions may require giving notice to professional bodies or journals, or the public.
   c. If an Investigator fails to comply with this Policy or a management plan in a way that could have biased the design, conduct, or reporting of PHS-Funded Research, the Institution shall promptly notify the PHS awarding component of the corrective action taken or to be taken (e.g., a mitigation report for the PHS-Funded Research, as further described below), and implement corrective action. AGS shall promptly notify NIH when noncompliance by an Investigator or subrecipient Investigator with AGS's FCOI policy or an FCOI management plan appears to have biased the design, conduct, or reporting of NIH-funded research.

C. Management of Financial Conflict of Interests

1. **Management Plans.** Each management plan shall specify the actions that have been, and shall be, taken to Manage the Financial Conflict of Interest ("FCOI"). At a minimum, the management plan shall identify, as applicable: (i) the role and principal duties of the conflicted Investigator in the research project; (ii) the conditions of the management plan;

(iii) how the management plan is designed to safeguard objectivity; (iv) confirmation that the Investigator has agreed to the management plan; and (v) how AGS will monitor compliance with the management plan.

2. **Conditions or Restrictions.** Examples of conditions or restrictions that might be imposed to manage an FCOI include, but are not limited to:
    a. Public disclosure of the FCOI (e.g., when presenting or publishing the research);
    b. For PHS-Funded Research projects involving human subjects research, disclosure of the FCOI directly to the human subjects as approved by the Institutional Review Board;
    c. Appointment of an independent monitor capable of taking measures to protect the design, conduct, and reporting of the PHS-Funded Research against bias resulting from the FCOI;
    d. Modification of the research plan;
    e. Change of personnel or personnel responsibilities, or disqualification of personnel from participation in all or a portion of the PHS-Funded Research;
    f. Reduction or elimination of a financial interest (e.g., sale of an equity interest); and
    g. Severance of relationships that create the Financial Conflict of Interest.
3. **Clinical Research.** The existence of a Financial Conflict of Interest ("FCOI") related to a clinical research project creates a rebuttable presumption that stringent management of the FCOI is appropriate. In any case in which HHS determines that an NIH-funded project of clinical research whose purpose is to evaluate the safety or effectiveness of a drug, medical device, or treatment has been designed, conducted, or reported by an Investigator with an FCOI that was not managed or reported by AGS as required, AGS shall require the Investigator involved to disclose the FCOI in each public presentation of the results of the research and to request an addendum to previously published presentations.
4. **Monitoring Compliance with the Management Plan.** The AGS will monitor and document in sufficient detail to demonstrate Investigator compliance with the management plan on an ongoing basis until the completion of the PHS-Funded Research.

D. New SFIs during ongoing PHS-Funded Research

Whenever, in the course of ongoing PHS-Funded Research, an Investigator who is new to participating in the PHS-Funded Research discloses an SFI or an existing Investigator discloses a new SFI, the Designated Official will do the following, acting directly or in conjunction with the Review Committee, within sixty (60) days:

- review the SFI;
- determine whether it is related to PHS-Funded Research;
- determine whether a Financial Conflict of Interest exists, and, if so
- implement a management plan that shall specify the actions that have been, and will be, taken to manage such Financial Conflict of Interest.

E. Review of Existing SFIs and Retrospective Review during ongoing PHS-Funded Research

The Designated Official, acting directly or in conjunction with the Review Committee, will take the following actions with respect to a Financial Conflict of Interest in ongoing PHS-Funded Research:

1. **Review of Existing SFIs.** Whenever AGS identifies an SFI that was not disclosed timely by an Investigator or, for whatever reason, was not previously reviewed during ongoing PHS-Funded Research (e.g. was not timely reviewed or reported by a subrecipient), the Designated Official will, within sixty (60) days, undertake the same review, determinations and management plan implementation set forth in Section IV. D, above. Any management plan implemented under this section shall be implemented on at least an interim basis pending completion of the required review.
2. **Retrospective Review.** Whenever an FCOI is not identified or managed in a timely manner, including failure by the Investigator to disclose an SFI that is determined by the Institution to constitute an FCOI, failure by the Institution to review or manage such an FCOI, or failure by the Investigator to comply with an FCOI management plan, the Designated Official will, within 120 days of the Institution's determination of noncompliance, complete a retrospective review of the Investigator's activities and the PHS-Funded Research. The retrospective review shall determine whether any PHS-Funded Research, or portion thereof, conducted during the period of noncompliance was biased in the design, conduct, or reporting of such Research. The retrospective review shall be documented and shall include, at a minimum:
    - Project number;
    - Project title;
    - PD/PI or contact PD/PI, if a multiple-PD/PI model is used;
    - Name of the Investigator with the FCOI
    - Name of the entity with which the Investigator has the FCOI;
    - Reasons for the retrospective review;
    - Detailed methodology used for the retrospective review, including the review process, composition of the review panel, and documentation reviewed;
    - Findings of the review; and
    - Conclusions of the review.

3. **Notification and Mitigation Report.** If the retrospective review determines that bias occurred in the design, conduct, or reporting of PHS-funded research, AGS shall promptly notify the PHS Awarding Component and submit a mitigation report. The mitigation report shall include the required elements of the retrospective review and a description of the impact of the bias on the research project, together with AGS's plan of action or actions taken to eliminate or mitigate the effects of the bias.
4. **Interim Measures.** At any time, the Designated Official may determine that interim measures are necessary with regard to the Investigator's participation in the PHS-Funded Research.

F. Training

Every Investigator will complete training on Investigator policy responsibilities at the following times:

1. Prior to engaging in PHS-Funded Research and at least once every four years thereafter;
2. When this policy is revised in any manner that affects the requirements of Investigators;
3. When an Investigator is new to AGS, even if the PHS-Funded Research has already begun;
4. When an Investigator is not in compliance with this policy or a management plan, as determined by the Designated Official.

Training shall inform Investigators of AGS's FCOI policy, applicable federal FCOI requirements, and the

Investigator's responsibility to disclose all qualifying domestic and foreign SFIs, including those of the Investigator's spouse and dependent children. AGS shall take reasonable steps to ensure that subrecipient Investigators receive required FCOI training

G. Subrecipients

If AGS is the awardee and conducts PHS-Funded Research through a subrecipient (e.g. subcontractors or consortium members), the Designated Official will take reasonable steps to ensure that subrecipient Investigators comply with this Policy, as follows:

1. AGS's written agreement with the subrecipient will establish whether this Policy or the subrecipient's Financial Conflicts of Interest policy will apply to the subrecipient's Investigators. The written agreement will state either that:
    a. The subrecipient certifies that its Financial Conflicts of Interest policy complies with the applicable federal regulations, and that the subrecipient's Investigators will comply with the subrecipient's policy or,
    b. if the subrecipient cannot provide such certification, that subrecipient Investigators are subject to this Policy.
2. If the subrecipient's policy applies, the written agreement will specify the time period(s) for the subrecipient to report all identified FCOIs initially and annually thereafter to AGS. The time period(s) will be sufficient to enable AGS to provide FCOI reports to the PHS prior to the expenditure of funds and within 60 days of finding any additional FCOI.
3. If AGS's policy, as awardee, applies, the subrecipient Investigators will disclose all Significant Financial Interests that are directly related to the subrecipient's work for AGS. The written agreement with the subrecipient will specify the time period in which to comply, sufficiently allowing AGS enough time to comply timely with its review, management and reporting obligations, e.g., to provide FCOI reports to the PHS prior to the expenditure of funds, within 60 days of finding any additional FCOI and annually thereafter.

The written agreement shall also establish procedures for the subrecipient to report newly identified FCOIs, changes in previously reported FCOIs, and information necessary for annual FCOI reporting. AGS shall manage and report subrecipient Investigator FCOIs as required by applicable federal regulations and NIH policy.

H. Reporting of Financial Conflict of Interest

1. **Initial Reports**. Prior to the Institution's expenditure of any funds under NIH-funded research, the Designated Official shall submit an FCOI report to the PHS Awarding Component regarding any Investigator FCOI, unless the FCOI has been eliminated. For NIH grants and cooperative agreements, FCOI reports shall be submitted through the eRA Commons FCOI Module. For NIH-funded research contracts, AGS shall follow the reporting instructions of the applicable contracting officer and 45 CFR Part 94.
2. **New FCOIs.** For newly identified FCOIs during ongoing PHS-Funded Research, the Designated Official shall submit an FCOI report to the applicable PHS Awarding Component within sixty (60) days of identification and ensure that an appropriate management plan has been implemented.
3. **Retrospective Review and Mitigation.** For FCOIs not previously disclosed, reviewed or managed during ongoing PHS-Funded Research, AGS shall complete the required retrospective review within 120 days of the determination of noncompliance. If the retrospective review identifies bias, AGS shall promptly submit the required mitigation report to NIH.
4. **Annual Reports.** After submission of an initial FCOI report, the Designated Official shall provide the applicable PHS Awarding Component with annual FCOI reports for the duration of the PHS-Funded Research, including extensions with or without funds, at the time and in the manner specified by the applicable PHS Awarding Component. Annual reports shall address the status of

the FCOI and any changes to the management plan and shall be submitted at least annually, generally at the same time as the annual progress report, multi-year progress report, if applicable, or at the time of extension.

5. **Information available to PHS/NIH.** The AGS shall, upon request of PHS/NIH, make available information relating to any Investigator disclosure of financial interests and the Institution's review of, and response to, such disclosure, whether or not the disclosure resulted in an FCOI.

I. Maintenance of Records

AGS shall maintain all FCOI-related records relating to Investigator disclosures of financial interests; AGS's review of and response to such disclosures, whether or not a disclosure resulted in an FCOI; and all actions taken under this Policy or as part of a retrospective review. Such records shall be maintained for at least three (3) years from the date the final expenditures report is submitted to the Federal Government, or for such other period as required by applicable federal records-retention requirements, including 2 CFR § 200.334 where applicable.

J. Public Accessibility

1. **FCOI Policy.** AGS shall maintain the current FCOI policy on its publicly accessible website (http://www.americangeriatrics.org) and shall submit the policy to NIH through the eRA Commons Institution Profile (IPF) Module.
2. **Public Accessibility of FCOIs.** AGS shall make information concerning identified FCOIs held by Senior/Key Personnel publicly accessible prior to the expenditure of funds, either through a publicly accessible website or through a written response to any requestor within five (5) business days of receiving a written request. AGS shall select one of these methods and apply it consistently. The publicly accessible information shall include, at a minimum:
    - The Investigator's name;
    - The Investigator's title and role with respect to the research project;
    - The name of the entity in which the SFI is held;
    - The nature of the SFI; and
    - The approximate dollar value or value range of the SFI as follows:
        - $0–$4,999
        - $5,000–$9,999
        - $10,000–$19,999
        - $20,000–$100,000 in $20,000 increments
        - above $100,000 in $50,000 increments
        - or a statement that the value cannot readily be determined

For information posted on a website, AGS shall update the information at least annually and within sixty (60) days of identifying a new FCOI. Information shall remain available for at least three (3) years from the date it was most recently updated. Posted information will note that it is current as of the date listed and subject to updates. Responses to written requests shall contain the current information required by applicable federal regulations.

When PHS-Funded Research is conducted by a subrecipient Investigator, and the subrecipient is required under the written agreement to comply with the subrecipient's FCOI policy, the subrecipient shall have responsibility for making the information publicly accessible as required by applicable federal regulations.

V. Responsible Parties

The AGS CEO, or designee serving as Designated Official, is responsible for administration of the

Investigator disclosure and FCOI review process. AGS's grants/compliance function, or another individual designated in writing, is responsible for ensuring required NIH reporting, policy submission through the eRA Commons IPF Module, maintenance of public accessibility, records retention, and coordination with subrecipients.

VI. Related Policies and References

A. Related AGS Policies

a. American Geriatrics Society Conflict of Interest Policy & Procedures

VII. Policy History

Effective Date: October 11, 2013
Revised: March 1, 2021
Revised: August 20, 2026

The 2026 revision was reviewed against NIH FCOI Policy Development Checklist (revised June 29, 2026) and the NIH Grants Policy Statement (revised March 2026).

VIII. Federal Authorities and Guidance

This Policy shall be interpreted consistently with applicable federal requirements and current NIH guidance, including:

1. 42 CFR Part 50, Subpart F, Responsibility of Applicants for Promoting Objectivity in Research for which PHS Funding is Sought;
2. 45 CFR Part 94, Responsible Prospective Contractors;
3. NIH Grants Policy Statement, Section 4.1.10, Financial Conflict of Interest;
4. NIH FCOI Policy Development Checklist, revised June 29, 2026;
5. Applicable NIH Guide Notices and FCOI FAQs; and
6. Applicable federal records-retention requirements, including 2 CFR § 200.334 where applicable.

In the event of a conflict between this Policy and an applicable federal statute, regulation, or binding NIH award requirement, the federal requirement shall control.