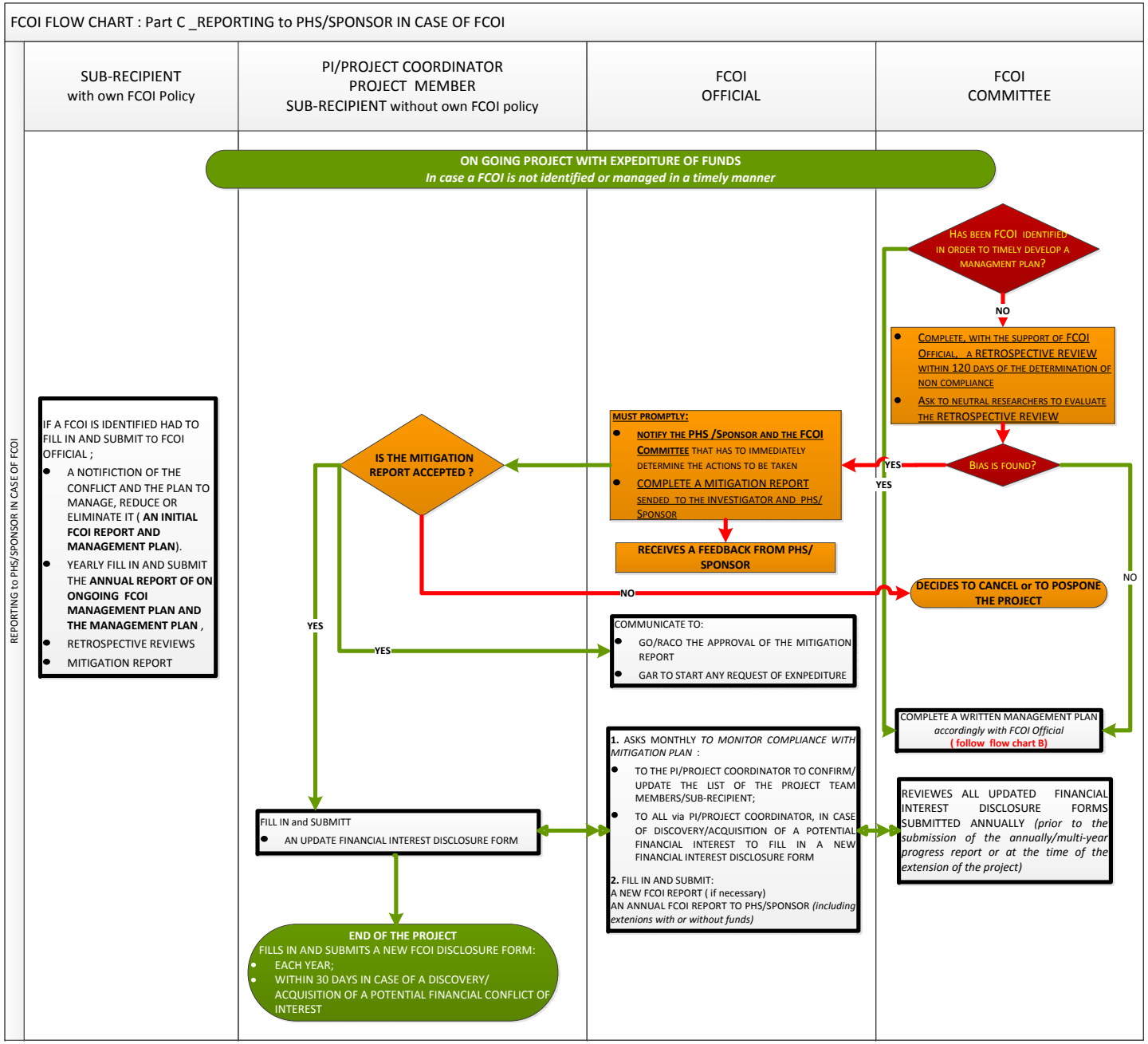
FCOI FLOW CHART : Part C _REPORTING to PHS/SPONSOR IN CASE OF FCOI
REPORTING to PHS/SPONSOR IN CASE OF FCOI
SUB-RECIPIENT
with own FCOI Policy
PI/PROJECT COORDINATOR
PROJECT MEMBER
SUB-RECIPIENT without own FCOI policy
FCOI
OFFICIAL
FCOI
COMMITTEE
ON GOING PROJECT WITH EXPEDITURE OF FUNDS
In case a FCOI is not identified or managed in a timely manner
HAS BEEN FCOI IDENTIFIED IN ORDER TO TIMELY DEVELOP A MANAGMENT PLAN?
NO
COMPLETE, WITH THE SUPPORT OF FCOI OFFICIAL, A RETROSPECTIVE REVIEW WITHIN 120 DAYS OF THE DETERMINATION OF NON COMPLIANCE
ASK TO NEUTRAL RESEARCHERS TO EVALUATE THE RETROSPECTIVE REVIEW
BIAS IS FOUND?
YES
YES
NO
IF A FCOI IS IDENTIFIED HAD TO FILL IN AND SUBMIT TO FCOI OFFICIAL ;
A NOTIFICTION OF THE CONFLICT AND THE PLAN TO MANAGE, REDUCE OR ELIMINATE IT (AN INITIAL FCOI REPORT AND MANAGEMENT PLAN).
YEARLY FILL IN AND SUBMIT THE ANNUAL REPORT OF ON ONGOING FCOI MANAGEMENT PLAN AND THE MANAGEMENT PLAN ,
RETROSPECTIVE REVIEWS
MITIGATION REPORT
IS THE MITIGATION REPORT ACCEPTED ?
MUST PROMPTLY:
NOTIFY THE PHS /SPONSOR AND THE FCOI COMMITTEE THAT HAS TO IMMEDIATELY DETERMINE THE ACTIONS TO BE TAKEN
COMPLETE A MITIGATION REPORT SENDED TO THE INVESTIGATOR AND PHS/ SPONSOR
RECEIVES A FEEDBACK FROM PHS/ SPONSOR
NO
DECIDES TO CANCEL or TO POSPONE THE PROJECT
YES
YES
COMMUNICATE TO:
GO/RACO THE APPROVAL OF THE MITIGATION REPORT
GAR TO START ANY REQUEST OF EXNPEDITURE
COMPLETE A WRITTEN MANAGEMENT PLAN accordingly with FCOI Official (follow flow chart B)
1. ASKS MONTHLY TO MONITOR COMPLIANCE WITH MITIGATION PLAN :
TO THE PI/PROJECT COORDINATOR TO CONFIRM/ UPDATE THE LIST OF THE PROJECT TEAM MEMBERS/SUB-RECIPIENT;
TO ALL via PI/PROJECT COORDINATOR, IN CASE OF DISCOVERY/ACQUISITION OF A POTENTIAL FINANCIAL INTEREST TO FILL IN A NEW FINANCIAL INTEREST DISCLOSURE FORM
2. FILL IN AND SUBMIT:
A NEW FCOI REPORT (if necessary)
AN ANNUAL FCOI REPORT TO PHS/SPONSOR (including extenions with or without funds)
REVIEWES ALL UPDATED FINANCIAL INTEREST DISCLOSURE FORMS SUBMITTED ANNUALLY (prior to the submission of the annually/multi-year progress report or at the time of the extension of the project)
FILL IN and SUBMITT
AN UPDATE FINANCIAL INTEREST DISCLOSURE FORM
END OF THE PROJECT
FILLS IN AND SUBMITS A NEW FCOI DISCLOSURE FORM:
EACH YEAR;
WITHIN 30 DAYS IN CASE OF A DISCOVERY/ ACQUISITION OF A POTENTIAL FINANCIAL CONFLICT OF INTEREST