September 11, 2012

MEMO

To: Mississippi State University Faculty & Staff

From: Richard Swann, Director
Sponsored Programs Administration

RE: Public Health Service Financial Conflict of Interest Regulations

With the passage of the new Public Health Service's Financial Conflict of Interest regulations (effective 8/24/2012), there will be changes to the business process for PHS proposals and awards.

At proposal stage:

Sponsored Programs Administration will be unable to submit any proposals for PHS funding (NIH, CDC, FDA, SAMSHA, etc.) until the following has occurred:

1. All investigators have completed Conflict of Interest Training.
2. All investigators have returned their completed Significant Financial Interest Disclosure Form.
3. MSU has received confirmation from our subawardees that they are in compliance with the new PHS regulations. This can be accomplished through the use of the Subaward Commitment Form available at http://www.spa.msstate.edu/forms/pdfs/SAF_03.pdf.

These rules will apply whether we are submitting directly to a PHS entity or through another entity for this funding.

At award stage:

1. Sponsored Programs Administration will be unable to award a project (or issue a preliminary account) until all investigators have been trained, completed their disclosure forms and had all conflicts managed.
2. Sponsored Programs Administration will also be unable to issue a subaward from a project until the subawardee is in compliance with the PHS regulations (i.e., all investigators have been trained, completed necessary forms and had all conflicts managed).

Please begin the sponsored programs process early to take into account the additional time needed to comply with these new regulations.

For any questions concerning the Sponsored Programs Administration process for PHS funded research, please contact SPA at (662) 325-7404. For any questions regarding the Financial Conflict of Interest regulations, training or forms, please contact Kacey Strickland in the Office of Regulatory Compliance & Safety at 325-7474.