

**CONFLICT OF INTEREST POLICY FOR PHS Funded Research  
OHIO VALLEY ALLIES  
("Organization")**

**Conflict of Interest (COI) Policy Statement for PHS-Funded Research**

**Purpose:**

This policy is established to ensure objectivity in research by identifying and managing financial conflicts of interest (FCOIs) in projects funded by the Public Health Service (PHS), including the National Institutes of Health (NIH), in compliance with federal regulations **42 CFR Part 50 Subpart F** and **45 CFR Part 94**.

**Scope:**

This policy applies to all Investigators, including subrecipients, who are responsible for the design, conduct, or reporting of research funded by PHS grants, cooperative agreements, or contracts.

**Policy Statement:**

Ohio Valley Allies committed to promoting objectivity in research and ensuring that the design, conduct, and reporting of PHS-funded research is free from bias resulting from financial conflicts of interest. To that end:

**1. Disclosure Requirement:**

All Investigators must disclose to [Institution Name] all significant financial interests (SFIs) related to their institutional responsibilities:

- Prior to receipt of a PHS-funded grant,
- At least annually thereafter, and
- Within 30 days of discovering or acquiring a new SFI.

**2. Review and Management:**

All disclosed SFIs will be reviewed by the Board of Directors to determine if a financial conflict of interest exists. If a FCOI is identified, a management plan will be implemented before the expenditure of PHS funds.

**3. Public Accessibility:**

In accordance with PHS regulations, Ohio Valley Allies will make information concerning identified FCOIs held by senior/key personnel publicly available upon request within five business days.

**4. Training:**

All Investigators must complete COI training:

- Prior to engaging in PHS-funded research,
- At least every four years, and
- Immediately when policy changes occur, an Investigator is new to the institution, or an Investigator is found to be noncompliant.

**5. Noncompliance and Enforcement:**

Instances of noncompliance will be addressed according to institutional policy and may involve reporting to the PHS funding agency, including retrospective review and mitigation plans if bias is identified in the research record.

**6. Subrecipients:**

Subrecipients must comply with this policy or provide a certification that their COI policy complies with PHS regulations. A written agreement will outline the responsibilities for COI reporting and management.

**Definitions:**

- **Investigator:** The project director or principal investigator and any other person who is responsible for the design, conduct, or reporting of research funded by the PHS.
- **Significant Financial Interest (SFI):** A financial interest consisting of one or more of the following, when reasonably related to the Investigator's institutional responsibilities, as defined by federal regulation.
- **Financial Conflict of Interest (FCOI):** A significant financial interest that could directly and significantly affect the design, conduct, or reporting of PHS-funded research.

**Effective Date:** August 11, 2025

**Policy Owner:** Ohio Valley Allies

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