Open Free Science Inc

Financial Conflict of Interest Policy for NIH/PHS-Funded Research

Policy owner	Open Free Science Inc (OFS)
Adopted	September 16, 2026
Effective	September 16, 2026
FCOI Institutional Official	Tingting Zhao, Director of Scientific Programs
Alternate FCOI Official	Independent director designated by the Board
Backup Alternate	Other disinterested director, if needed

This policy supplements OFS's general Conflict of Interest Policy and is intended to implement 42 CFR Part 50, Subpart F for NIH/PHS-funded grants and cooperative agreements.

1. Purpose

Open Free Science Inc (OFS) is committed to promoting objectivity in research. This policy establishes OFS procedures for identifying, reviewing, managing, and reporting financial conflicts of interest (FCOIs) in research funded or proposed for funding by the National Institutes of Health (NIH) and other Public Health Service (PHS) components that apply 42 CFR Part 50, Subpart F. This policy supplements, and does not replace, the OFS organizational Conflict of Interest Policy.

2. Scope

This policy applies to each Investigator who is planning to participate in or is participating in NIH/PHS-funded research through OFS. It applies to NIH grants and cooperative agreements subject to 42 CFR Part 50, Subpart F. Phase I SBIR/STTR applications and awards are excluded from the federal FCOI regulation.

3. Definitions

Investigator

The project director/principal investigator and any other person, regardless of title or position, who is responsible for the design, conduct, or reporting of NIH/PHS-funded research, or research proposed for such funding. Depending on responsibilities, this may include employees, officers, collaborators, consultants, and other participants.

Institutional Responsibilities

An Investigator's professional responsibilities performed on behalf of OFS, including, as applicable, research, research consultation, proposal development, scientific or technical oversight, data analysis, publication and reporting, research administration, teaching or training conducted on behalf of OFS, committee or advisory activities, and other professional activities performed in an OFS capacity.

Significant Financial Interest (SFI)

A financial interest consisting of one or more interests of the Investigator, the Investigator's spouse, or dependent children that reasonably appears to be related to the Investigator's Institutional Responsibilities, as described below.

- Publicly traded entity: remuneration received from the entity in the 12 months preceding disclosure plus the value of any equity interest in the entity as of the disclosure date, when the aggregate exceeds $5,000.
- Non-publicly traded entity: remuneration received from the entity in the 12 months preceding disclosure that exceeds $5,000, or any equity interest in the entity.
- Intellectual property rights and interests (for example, patents or copyrights) upon receipt of income related to those rights and interests.
- Reimbursed or sponsored travel related to Institutional Responsibilities, except travel excluded by the federal regulation. The disclosure must identify at least the purpose of the trip, sponsor/organizer, destination, and duration.
- Applicable foreign financial interests. Investigators must disclose foreign financial interests as required by the federal regulation; exclusions applicable to specified U.S. governmental and U.S. academic entities do not automatically extend to foreign entities.

Financial Conflict of Interest (FCOI)

An SFI that OFS reasonably determines could directly and significantly affect the design, conduct, or reporting of NIH/PHS-funded research.

Institutional Official

The OFS official designated to administer this policy and perform institutional review and determinations. The Board designates Tingting Zhao, Director of Scientific Programs, as the initial FCOI Institutional Official. The Board may change this designation or appoint additional officials at any time.

4. Investigator Identification

For each NIH/PHS proposal and award, OFS shall identify the individuals who meet the regulatory definition of Investigator based on their responsibilities, not solely their title, employment status, budget category, or organization. OFS may use an Investigator Determination Record or equivalent documentation for this purpose.

5. Investigator Disclosure Requirements

Each Investigator must disclose all foreign and domestic SFIs meeting the requirements of this policy:

- No later than the time OFS submits an application for NIH/PHS funding;
- At least annually during the period of an award, in accordance with OFS procedures; and
- Within 30 days of discovering or acquiring a new SFI.

Investigators must provide additional information reasonably requested by OFS to evaluate an SFI, determine whether an FCOI exists, or meet NIH/PHS reporting obligations.

6. Excluded Interests

OFS applies the exclusions contained in 42 CFR Part 50, Subpart F and does not impose more restrictive monetary thresholds. Significant Financial Interest does not include: salary, royalties, or other remuneration paid by OFS to an Investigator who is currently employed or otherwise appointed by OFS; income from investment vehicles such as mutual funds and retirement accounts, provided the Investigator does not directly control the investment decisions; and income from seminars, lectures, teaching engagements, or service on advisory committees or review panels 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, as

provided by the federal regulation. OFS will interpret these exclusions consistently with current NIH/PHS requirements.

7. FCOI Institutional Official and Routine Administration

The FCOI Institutional Official is responsible for routine administration of this policy, including identifying Investigators, distributing and collecting disclosures, reviewing disclosures when not conflicted, maintaining records, tracking training, documenting determinations, monitoring management plans, and coordinating required institutional reporting.

Routine FCOI administration does not require Board review or approval unless this policy, OFS's organizational Conflict of Interest Policy, or another applicable requirement calls for independent action.

8. Recusal and Independent Review

No FCOI Institutional Official may make the final institutional determination concerning the official's own SFI or any matter in which the official has an actual conflict or cannot exercise independent judgment. Such a matter shall be referred to the Alternate FCOI Official, who shall be a disinterested OFS director designated by the Board. If that person is unavailable or conflicted, the other disinterested director shall serve as backup. The Board may instead designate a qualified independent external reviewer when appropriate.

An Investigator whose disclosure is under review may provide factual information but may not make OFS's final determination concerning the Investigator's own SFI or FCOI.

9. Institutional Review and FCOI Determination

Before expenditure of NIH/PHS award funds, and whenever a new or newly disclosed SFI requires review, the appropriate OFS reviewer shall determine whether the SFI is related to the NIH/PHS-funded research. An SFI is related when it could be affected by the research or is in an entity whose financial interest could be affected by the research. If related, OFS shall determine whether the SFI could directly and significantly affect the design, conduct, or reporting of the research. If so, an FCOI exists.

OFS shall document the review and determination even when no FCOI is found.

10. Management of Identified FCOIs

When OFS determines that an FCOI exists, OFS shall implement an appropriate written management plan and report the FCOI as required before expenditure of funds or within the applicable federal reporting period. Management measures may include public disclosure, disclosure to research participants when appropriate, independent monitoring, modification of the research plan, change of personnel or responsibilities, disqualification from portions of the research, reduction or elimination of the financial interest, severance of relationships creating the conflict, or other measures appropriate to protect research objectivity.

The management plan shall document the role and duties of the conflicted Investigator, conditions imposed, how the plan protects objectivity, confirmation of the Investigator's agreement, monitoring procedures, and other information required for NIH reporting.

11. Training

Each Investigator subject to this policy shall be informed of this policy, the Investigator's disclosure responsibilities, and the applicable federal regulation, and shall complete FCOI training:

- Before engaging in research related to an NIH/PHS-funded grant;
- At least every four years thereafter; and
- Immediately when OFS revises this policy in a manner affecting Investigator requirements, when an Investigator is new to OFS, or when OFS determines that an Investigator is not in compliance with this policy or an FCOI management plan.

OFS may use NIH training resources together with an OFS policy acknowledgment or other documented training process.

12. Subrecipients

When OFS conducts NIH/PHS-funded research through a subrecipient, the written subaward or consortium agreement shall establish whether the subrecipient Investigators will comply with the subrecipient's FCOI policy or the OFS policy and shall establish reporting/disclosure deadlines sufficient for OFS to meet its federal obligations.

OFS's preferred approach, when practicable, is for a subrecipient that maintains a compliant PHS FCOI policy to administer its own Investigator disclosures, reviews, training, management, and internal records and to report identified FCOIs to OFS within the time specified in the written agreement. If the OFS policy applies instead, the agreement shall require subrecipient Investigators to submit disclosures to OFS within the specified timeframe.

13. Consultants and Collaborators

A consultant, collaborator, or other nonemployee is subject to this policy when the person meets the regulatory definition of Investigator. Payment from the award, a consultant title, or participation in a project does not by itself determine Investigator status. OFS shall document the determination based on responsibility for the design, conduct, or reporting of the research.

14. Related-Party Matters

Investigator FCOI review under this policy is separate from OFS organizational conflict-of-interest review. A transaction, subaward, consulting arrangement, service agreement, license, or other arrangement involving a related party, as defined in the OFS Organizational Conflict of Interest Policy, may require review under both systems.

When OFS's organizational Conflict of Interest Policy applies, interested directors or officers shall disclose the interest and follow the recusal and disinterested-review procedures required by that policy. Compliance with this research FCOI policy does not replace those organizational governance requirements.

15. Reporting to NIH/PHS

OFS shall submit required FCOI reports through the eRA Commons FCOI Module or other mechanism required by the awarding component, including:

(a) an initial FCOI report before the expenditure of any funds under an award, for any FCOI identified and managed prior to award;

(b) a report within 60 days for any FCOI identified and managed on an active award, including one identified through a subsequent disclosure, a new SFI, or a re-review triggered by a change in an Investigator's role or a new relationship;

(c) an annual FCOI report for the duration of the project period, for as long as a managed FCOI remains ongoing; and

(d) a revised FCOI report within 60 days whenever a previously reported FCOI is no longer managed, or an additional FCOI requiring management is identified.

Reports shall contain the information required by 42 CFR Part 50, Subpart F and current NIH/PHS policy, including a description of the SFI, its relatedness to the funded research, and the key elements of the management plan. OFS shall continue required annual reporting for the duration of the competitive segment until the FCOI no longer exists or no longer requires management.

16. Public Accessibility

OFS shall maintain this FCOI policy on a publicly accessible OFS website and submit the policy to NIH through the eRA Commons Institutional Profile (IPF) Module as required.

For each identified FCOI involving senior/key personnel on NIH/PHS-funded research, OFS shall satisfy public accessibility through one of the following methods, consistent with 42 CFR Part 50, Subpart F:

(a) posting the required information on a publicly accessible OFS website, updated at least annually and within 60 days of any change; or

(b) responding in writing to any request for the required information within 5 business days of the request.

The required information shall include, at minimum, the Investigator's name and title, role with respect to the research, the name of the entity in which the SFI is held, the nature of the SFI, and the approximate dollar value of the SFI, or a statement that the interest is one whose value cannot be readily determined.

17. Noncompliance, Retrospective Review, and Mitigation

If OFS identifies an SFI that was not disclosed or reviewed in a timely manner, or an FCOI that was not identified or managed in a timely manner, OFS shall take the actions required by the federal regulation. When required, OFS shall complete and document a retrospective review within 120 days of determining noncompliance to assess whether the research conducted during the period of noncompliance was biased in design, conduct, or reporting. If bias is found, OFS shall notify the awarding component promptly and submit a mitigation report as required.

18. Enforcement

Failure to comply with this policy, disclosure requirements, training requirements, or an approved management plan may result in corrective action appropriate to the individual's relationship with OFS, including modification of responsibilities, removal from research activities, termination of an agreement, or other action permitted by law and OFS policy.

19. Records Retention

OFS shall maintain records relating to Investigator disclosures, institutional review and determinations, management plans, monitoring, FCOI reports, retrospective reviews, mitigation, training, and related actions for at least the period required by 42 CFR Part 50, Subpart F and applicable NIH/PHS award requirements. Records shall be made available to NIH/PHS promptly upon request as required.

20. Relationship to Other Disclosures

FCOI disclosure is distinct from NIH Other Support, biosketch, foreign component, organizational conflict-of-interest, and other disclosure requirements. Compliance with one requirement does not eliminate obligations under another.

21. Administration and Amendment

The Board of Directors adopts this policy and may amend it as necessary. The FCOI Institutional Official shall periodically review applicable federal requirements and recommend revisions when needed. Administrative forms and procedures consistent with this policy may be updated without amending the policy unless Board action is otherwise required.

References

- 42 CFR Part 50, Subpart F - Promoting Objectivity in Research.
- NIH, Financial Conflict of Interest, Grants & Funding (updated June 30, 2026).
- NIH Grants Policy Statement, Section 4.1.10, Financial Conflict of Interest (revised March 2026).
- NIH, FCOI Policy Development Checklist (June 29, 2026).
- NIH Grants Policy Statement, Section 15.2, Administrative and Other Requirements for Consortium Agreements; and NIH Guide Notice NOT-OD-23-182, Final Updated Policy Guidance for Subaward/Consortium Written Agreements.

Board Adoption

Approved by	Board of Directors, Open Free Science Inc
Date	09/26/2026
Certification	Secretary: Ming Tang