ARISTOTLE UNIVERSITY OF THESSALONIKI

RESEARCH COMMITTEE OF ARISTOTLE UNIVERSITY OF THESSALONIKI

FINANCIAL CONFLICT OF INTEREST (FCOI) POLICY

FOR PUBLIC HEALTH SERVICE (PHS) / NIH-FUNDED RESEARCH

In accordance with 42 CFR Part 50, Subpart F
"Promoting Objectivity in Research"

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1) Introduction

The purpose of this Policy is to ensure that research funded by the United States Public Health Service (PHS), including the National Institutes of Health (NIH), is designed, conducted, and reported objectively and without bias resulting from Investigator financial conflicts of interest (FCOI).

This Policy implements the requirements of 42 CFR Part 50, Subpart F, “Promoting Objectivity in Research,” for PHS/NIH grants and cooperative agreements. Where AUTh participates in a PHS research contract subject to 45 CFR Part 94, the corresponding contract requirements shall also apply.

Aristotle University of Thessaloniki (AUTh), through the Research Committee of Eidikos Logariasmos Kondilion Erevnas (Special Account for Research Funds) of AUTh, adopts this Policy for all Investigators engaged in PHS/NIH-funded research. The Policy establishes processes to identify, disclose, review, manage, monitor, and report Investigator financial conflicts of interest in order to protect research integrity, the safety of human and animal subjects where applicable, and public trust in PHS/NIH-supported research.

This Policy supplements the existing institutional framework of AUTh concerning research integrity, impartiality, conflicts of interest, data protection, and research ethics. It shall be interpreted consistently with applicable Greek and European law, the AUTh Internal Rules of Operation, the Code of Ethics and Good Practice, the applicable AUTh funding and management rules, the applicable allocation of responsibilities within AUTh, the terms of the relevant PHS/NIH award, and the NIH Grants Policy Statement.

Where the requirements of 42 CFR Part 50, Subpart F, or the terms of a PHS/NIH award are more specific or more stringent than general institutional rules, those PHS/NIH requirements shall apply to the PHS/NIH-funded activity.

2) Applicability

This Policy applies to all individuals who meet the regulatory definition of Investigator and who plan to participate in, or participate in, PHS/NIH-funded research administered by AUTh.

The Policy applies when AUTh is the direct recipient of a PHS/NIH award and when AUTh participates as a subrecipient under an award made to another institution.

The Policy does not apply to Phase I Small Business Innovation Research (SBIR) or Small Business Technology Transfer (STTR) applications or awards to the extent excluded by the federal regulation.

Compliance with this Policy does not replace or limit obligations arising under other AUTh regulations, Greek or European legislation, contractual obligations, research ethics requirements, or other funder requirements.

3) Definitions

Financial Conflict of Interest (FCOI): A Significant Financial Interest (SFI) that the Research Committee of ELKE of AUTh, acting as the University's designated institutional body, reasonably determines is related to the PHS/NIH-funded research and could directly and significantly affect the design, conduct, or reporting of that research.

Financial Interest: Anything of monetary value, whether or not its value is readily ascertainable.

Institutional Responsibilities: An Investigator's professional responsibilities on behalf of AUTh, as defined by AUTh in this Policy and by the Investigator's actual institutional role. These may include, for example, research, research consultation and collaboration, teaching, professional or clinical practice, fundraising, product or service development, product testing, institutional administration, institutional committee membership, service on panels such as the research ethics committee / Institutional Review Board or Data and Safety Monitoring Board, development of datasets, models or systems, publication and communication of research results, and other professional activities performed on behalf of AUTh.

Designated Official(s) for SFI Review and FCOI Determination: AUTh designates the Research Committee of ELKE of AUTh as the institutional body responsible for the substantive review of

Significant Financial Interest (SFI) disclosures and for determining whether an SFI is related to PHS/NIH-funded research and, if related, whether it constitutes a Financial Conflict of Interest (FCOI). The Proposal Submission Office supports the solicitation and administrative receipt of disclosures; the substantive review and FCOI determination are made by the Research Committee.

President of the Research Committee: The President of the Research Committee of ELKE of AUTh ensures implementation of the Committee's determinations under this Policy and the completion of the institutional actions and reporting required by the applicable PHS/NIH requirements. This Policy does not alter the existing institutional arrangements for eRA Commons roles.

Administrative support: The Proposal Submission Office supports implementation of this Policy by receiving disclosures, checking them for completeness, maintaining the relevant records and the List of Investigators for FCOI Purposes, monitoring disclosure and training deadlines, and preparing complete files for review by the Research Committee. The Proposal Submission Office does not determine whether an SFI is related to PHS/NIH-funded research or constitutes an FCOI.

Investigator: The Project Director (PD) or Principal Investigator (PI), and any other person, regardless of title or position, who is responsible for the design, conduct, or reporting of PHS/NIH-funded research or research proposed for such funding, which may include collaborators or consultants. AUTh determines Investigator status on the basis of the individual's actual role and degree of responsibility or independence, rather than title alone. Membership in the project team does not automatically confer Investigator status.

Manage: Taking action to address an FCOI, which may include reducing or eliminating the FCOI, to ensure, to the extent possible, that the design, conduct, and reporting of the research are free from bias.

Research: A systematic investigation, study, or experiment designed to develop or contribute to generalizable knowledge relating broadly to public health, including basic, applied, behavioral and social-sciences research and product development.

PHS-Funded Research: Any research activity supported by a PHS Awarding Component through a grant, cooperative agreement, or, where applicable, contract.

PHS: The Public Health Service of the U.S. Department of Health and Human Services and any component to which the relevant authority may be delegated, including NIH.

NIH: The National Institutes of Health, a component of PHS.

Senior/Key Personnel: The PD/PI and any other individual identified by AUTh as senior/key personnel in the grant application, progress report, or other submission to PHS/NIH. For this Policy, this term is particularly relevant to the public accessibility requirements.

Significant Financial Interest (SFI)

A Significant Financial Interest (SFI) is a domestic or foreign financial interest of the Investigator, the Investigator's spouse, or dependent children, received from or held in an entity outside AUTh, that reasonably appears to be related to the Investigator's Institutional Responsibilities and falls within one or more of the categories and thresholds set out below.

a) Publicly traded entity. An SFI exists if the aggregate value of remuneration received from the entity in the twelve (12) months preceding the disclosure and the value of any equity interest in the entity as of the date of disclosure exceeds USD 5,000. Remuneration includes salary and any payment for services not otherwise excluded, such as consulting fees, honoraria, and paid authorship. Equity interest includes stock, stock options, or other ownership interests.

b) Non-publicly traded entity. An SFI exists if the aggregate value of remuneration received from the entity in the twelve (12) months preceding the disclosure exceeds USD 5,000, or if the Investigator, spouse, or dependent child holds any equity interest in the entity, regardless of value.

c) Intellectual property rights and interests. An SFI exists upon receipt of income greater than USD 5,000 in the twelve (12) months preceding the disclosure that is related to intellectual property rights or interests (e.g.,

patents, copyrights), including royalties and agreements to share in royalties related to licensed intellectual property rights.

d) Reimbursed or sponsored travel. Investigators must disclose any reimbursed or sponsored travel related to their Institutional Responsibilities when the value exceeds USD 5,000. Sponsored travel includes travel paid on behalf of the Investigator, even where the exact monetary value is not readily known. The disclosure must include, at a minimum, the purpose of the trip, the identity of the sponsor or organiser, the destination, and the duration. AUTh may request additional information, including monetary value, where necessary for institutional review.

Exclusions from SFI

The following interests are excluded from the definition of SFI to the extent provided by 42 CFR Part 50, Subpart F:

- salary, royalties, or other remuneration paid by AUTh to an Investigator who is currently employed or otherwise appointed by AUTh, including intellectual property rights assigned to AUTh and agreements to share in royalties related to those rights;
- income from investment vehicles such as mutual funds and retirement accounts, provided the Investigator does not directly control the investment decisions made in those vehicles;
- income from seminars, lectures, or teaching engagements sponsored by a U.S. Federal, state, or local government agency, a U.S. institution of higher education as defined at 20 U.S.C. 1001(a), an academic teaching hospital, a medical center, or a research institute affiliated with such a U.S. institution of higher education;
- income from service on advisory committees or review panels for the same categories of U.S. entities described above;
- reimbursed or sponsored travel paid by the same categories of U.S. entities described above.

Foreign Financial Interests

The exclusions described above for certain U.S. governmental and U.S. higher-education-related entities do not apply to foreign governments, foreign institutions of higher education, or other foreign entities. Domestic and foreign financial interests are subject to the same category-specific disclosure rules and thresholds set out in this Policy. Accordingly, applicable foreign remuneration, intellectual-property income, and reimbursed or sponsored travel must be disclosed when the relevant USD 5,000 threshold is exceeded, and any equity interest in a non-publicly traded foreign entity must be disclosed regardless of value.

4) Significant Financial Interest (SFI) Disclosure Requirements

Each Investigator is responsible for determining the professional activities that constitute their Institutional Responsibilities on behalf of AUTh and for disclosing to AUTh all domestic and foreign SFIs that reasonably appear to be related to those Institutional Responsibilities. Disclosure is not limited to the Investigator's research activities or to the specific PHS/NIH-funded research. The Investigator must not withhold an SFI on the basis of their own view that the interest is unrelated to the NIH-funded research; the determination of relatedness to the PHS/NIH-funded research and the determination of FCOI are institutional responsibilities of AUTh through the Research Committee of AUTh.

Investigators shall submit the AUTh Investigator SFI Disclosure Form when they have an SFI that must be disclosed under this Policy.

Operational forms, templates and administrative checklists used to implement this Policy are maintained separately by the Proposal Submission Office and do not form part of this Policy.

A. At the time of application / before participation

The PI and all other individuals who meet the definition of Investigator shall disclose their applicable SFIs no later than the time of application. Any new Investigator who joins after submission of the application or during

the course of the research must submit the required disclosure promptly and before participating in the research.

B. Annual disclosure during the award

Each Investigator participating in PHS/NIH-funded research shall submit an annual SFI disclosure update at least once every twelve (12) months, in accordance with the annual cycle prescribed by AUTh. The annual update shall confirm either that there is no SFI to disclose or shall provide any new or updated SFI information.

Where an SFI exists, the annual update must include any new information not previously disclosed and updated information concerning previously disclosed SFIs, including changes in value or status.

An annual update confirming that no SFI exists is an internal disclosure requirement and does not constitute an FCOI report to NIH. Only identified FCOIs are reported through the eRA Commons FCOI Module.

C. Ad hoc disclosure during the award

Each Investigator shall submit an updated disclosure within thirty (30) days of discovering or acquiring a new SFI, including through purchase, marriage, inheritance, or another relevant event. For reimbursed or sponsored travel that meets the Policy threshold, an updated disclosure must also be submitted within thirty (30) days of each occurrence.

D. Identification of Investigators for FCOI purposes

At the initiation of each PHS/NIH-funded project, the PD/PI, in cooperation with the Proposal Submission Office, shall identify the individuals who meet the definition of Investigator under this Policy. The resulting List of Investigators for FCOI Purposes shall be maintained by the Proposal Submission Office and updated whenever project personnel or responsibilities change.

5) Review of SFI Disclosures

The Research Committee of ELKE of AUTh, acting as the University's designated institutional body for SFI review and FCOI determination, shall review each complete SFI disclosure and document its review. For each disclosed SFI, the Research Committee shall determine: (a) whether the SFI is related to the PHS/NIH-funded research; and, if related, (b) whether the SFI constitutes an FCOI. The documentation of the review and determination, including a determination that no FCOI exists, shall form part of AUTh's internal FCOI records. The Proposal Submission Office shall perform the administrative completeness check and prepare the file for review by the Research Committee.

A member of the Research Committee or any other person involved in a review shall not participate in a matter in which that person has an actual or potential conflict of interest. Recusal and substitution shall be documented.

Each SFI shall be evaluated in relation to every PHS/NIH research application or award on which the Investigator is responsible for the design, conduct, or reporting of research.

A. Prior to a new award or expenditure of awarded funds

The Research Committee of ELKE of AUTh shall complete the required substantive institutional review before expenditure of PHS/NIH funds and, where feasible, during the pre-award or Just-in-Time stage. If an FCOI is identified, AUTh shall submit any required FCOI report through the eRA Commons FCOI Module before expenditure of funds.

B. Annual disclosure

Annual updates shall be reviewed to determine whether a new FCOI exists or whether changes to an existing Management Plan are necessary. Any relevant changes shall be reflected in the applicable annual FCOI report.

C. New Investigator or new SFI during the award

Within sixty (60) days of receipt or identification of a new SFI disclosure or the addition of a new Investigator, the Research Committee of ELKE of AUTh shall review the disclosure, determine whether the SFI is related to the PHS/NIH-funded research, determine whether an FCOI exists, and, if so, approve at least an interim Management Plan. AUTh shall submit any required FCOI report within the applicable regulatory timeframe.

6) Relatedness of SFIs to PHS/NIH-Funded Research and FCOI

The Research Committee of ELKE of AUTh, acting as the University's designated institutional body, is responsible for assessing the relatedness of SFIs to PHS/NIH-funded research and for determining whether a related SFI constitutes an FCOI.

An Investigator's SFI is related to PHS-funded research when the Research Committee reasonably determines that the SFI could be affected by the research or is in an entity whose financial interest could be affected by the research.

The Research Committee may consult the Investigator when assessing relatedness and may request clarification or additional documentation.

An FCOI exists when the Research Committee reasonably determines that a related SFI could directly and significantly affect the design, conduct, or reporting of the PHS-funded research. For purposes of this determination, "significantly" means that the financial interest would have a material effect on the research.

7) Management of SFIs that Pose an FCOI

When an FCOI is identified, the Research Committee shall approve a Management Plan designed to ensure, to the extent possible, that the design, conduct, and reporting of the PHS/NIH-funded research are free from bias. The Proposal Submission Office may support preparation and administrative processing of the Management Plan. The Investigator shall agree in writing to comply with the Management Plan.

Management measures may include, but are not limited to:

- public disclosure of the FCOI, for example in publications or presentations, to study personnel, to the Research Ethics Committee / Institutional Review Board (IRB), Institutional Animal Care and Use Committee (IACUC), or Data and Safety Monitoring Board, where applicable;
- for human-subjects research, disclosure of the FCOI to participants in the informed consent process where appropriate;
- appointment of an independent monitor capable of protecting the design, conduct, and reporting of the research against bias;
- modification of the research plan or protocol;
- independent data analysis, independent review, or additional oversight;
- change of personnel roles or removal of the Investigator from all or part of the research;
- reduction or elimination of the financial interest, including divestiture where appropriate;
- severance of relationships that create the financial conflict;
- other safeguards considered necessary and proportionate.

The determination and the approved Management Plan shall be communicated in writing to the Investigator.

No expenditure of PHS/NIH funds may occur where an identified FCOI requires prior management and reporting until the applicable requirements have been satisfied.

The Management Plan may be modified whenever necessary, including where there is a material change in the Investigator's role, the research, the financial interest, or other relevant circumstances.

8) Monitoring Investigator Compliance

The Research Committee of ELKE of AUTh shall ensure ongoing monitoring of Investigator compliance with each Management Plan for the duration of the identified FCOI and, where applicable, for the duration of the PHS/NIH award.

The Proposal Submission Office shall provide administrative support for monitoring, in coordination with the Research Committee of ELKE of AUTh and other competent AUTh units, and may request documentation necessary to demonstrate compliance with required disclosures or management measures. Only information necessary for compliance monitoring shall be requested and retained, subject to applicable data-protection and confidentiality requirements.

Where the AUTh FCOI Policy applies to subrecipient Investigators, AUTh shall ensure appropriate monitoring of compliance with any Management Plan applicable to those Investigators.

9) Public Accessibility of the FCOI Policy and FCOIs Held by Senior/Key Personnel

An up-to-date copy of this Policy shall be maintained on a publicly accessible AUTh webpage, including the official Research Committee of AUTh website where appropriate, and submitted to NIH through the eRA Commons Institutional Profile (IPF) Module in accordance with NIH requirements. The current public link shall be maintained through an official AUTh web presence.

Before expenditure of PHS/NIH funds, AUTh shall ensure public accessibility of information concerning any SFI held by Senior/Key Personnel that meets all of the following criteria:

- the SFI was disclosed and is still held by Senior/Key Personnel;
- the Research Committee of ELKE of AUTh determined that the SFI is related to the PHS/NIH-funded research; and
- the Research Committee of ELKE of AUTh determined that the SFI constitutes an FCOI.

AUTh shall satisfy this requirement by providing a written response to any requestor within five (5) business days of receipt of a written request. Written requests shall be submitted to the Proposal Submission Office through the contact details published with this Policy.

The written response shall include at least the Investigator's name; title and role in the research project; name of the entity in which the SFI is held; nature of the SFI; and approximate dollar value of the SFI in the following ranges: USD 0–4,999; USD 5,000–9,999; USD 10,000–19,999; amounts between USD 20,000 and USD 100,000 by increments of USD 20,000; amounts above USD 100,000 by increments of USD 50,000; or a statement that the value cannot readily be determined.

The response shall state that the information is current as of the date of the response and is subject to updates at least annually and within sixty (60) days of identification of a newly identified FCOI. Information subject to public accessibility shall remain available for at least three (3) years from the date it was most recently updated.

10) Reporting Identified Financial Conflicts of Interest

Where the Research Committee determines that an FCOI exists, AUTh shall submit the required FCOI report to the NIH Awarding Institute or Center through the eRA Commons FCOI Module when AUTh is the direct recipient, or to the prime recipient when AUTh is a subrecipient.

Only identified FCOIs are reported to NIH. If the Research Committee reviews a disclosed SFI and determines that no FCOI exists, no FCOI report is required; however, the institutional review and determination shall be documented and retained in AUTh's internal records.

A. Initial / Original FCOI Report

An initial FCOI report shall be submitted before expenditure of funds when an FCOI exists at the time of award, or within sixty (60) days of identifying a new FCOI during the award period. If AUTh identifies an FCOI and

eliminates the conflict before expenditure of PHS-awarded funds, no FCOI report is required solely for that eliminated conflict, in accordance with 42 CFR 50.605(b)(1).

The report shall include all information required by 42 CFR 50.605(b)(3) and current NIH requirements, including the grant number; PD/PI; Investigator with the FCOI; entity; nature and value of the financial interest; description of how the SFI relates to the research; basis for the FCOI determination; and key elements of the Management Plan.

B. Annual FCOI Report

For each previously reported FCOI, AUTh shall submit an annual FCOI report for the duration required by NIH, including applicable extensions. The annual report shall state whether the FCOI is still being managed or no longer exists and shall describe any changes to the Management Plan.

The annual FCOI report shall be submitted at the time required by NIH, including in connection with the Research Performance Progress Report (RPPR), multi-year progress report, or grant extension, as applicable. Annual FCOI reports are not required at grant closeout unless otherwise required by NIH.

C. Revised and Mitigation Reports

Following a retrospective review, AUTh shall revise a previously submitted FCOI report where required by NIH. If bias is found, AUTh shall promptly notify NIH and submit a Mitigation Report containing the information required by the regulation and current NIH guidance.

11) Training Requirements for Investigators

Each Investigator shall be informed of this Policy and trained on the Investigator's responsibility to disclose domestic and foreign SFIs related to Institutional Responsibilities and on the requirements of 42 CFR Part 50, Subpart F.

Training must be completed:

- before the Investigator engages in PHS/NIH-funded research;
- at least once every four (4) years thereafter;
- promptly when AUTh revises this Policy or related procedures in a way that affects Investigator requirements;
- before participation where an Investigator is new to AUTh PHS/NIH-funded research or is newly subject to this Policy;
- promptly when AUTh determines that an Investigator has not complied with this Policy or with a Management Plan.

AUTh shall require training that satisfies the applicable PHS/NIH requirements. NIH FCOI training resources may be used for this purpose. Evidence of completion shall be provided to and retained by the Proposal Submission Office.

12) Noncompliance With FCOI Policy and Corrective Actions

If AUTh identifies an SFI that was not disclosed, reviewed, or managed in a timely manner, the Research Committee of AUTh shall, within sixty (60) days, review the SFI; determine whether it is related to the PHS/NIH-funded research; determine whether it constitutes an FCOI; and, if so, approve at least an interim Management Plan. AUTh shall submit any required FCOI report.

Whenever an FCOI is not identified or managed in a timely manner, including because of an Investigator's failure to disclose an SFI, AUTh's failure to review or manage an FCOI, or an Investigator's failure to comply with a Management Plan, AUTh shall, within one hundred and twenty (120) days of identifying the noncompliance, complete and document a retrospective review to determine whether the research, or any portion of it, was biased in its design, conduct, or reporting.

The retrospective review shall include, as applicable, the project number and title; PD/PI; Investigator with the FCOI; entity; reason for the review; methodology; findings; and conclusions. Based on the review, AUTh shall update any previously submitted FCOI report where required.

If bias is found, AUTh shall promptly notify NIH or the prime recipient and submit a Mitigation Report describing the impact of the bias and the corrective actions taken or planned. AUTh may impose additional interim measures concerning the Investigator's participation until the review is complete.

13) Clinical Research Requirements

If the U.S. Department of Health and Human Services (HHS) or the applicable PHS/NIH Awarding Component determines that PHS-funded clinical research evaluating the safety or effectiveness of a drug, medical device, or treatment was designed, conducted, or reported by an Investigator with an unmanaged or unreported FCOI, AUTh shall require the Investigator to disclose the FCOI in each public presentation of the results and to request an addendum to previously published presentations, as required by 42 CFR Part 50, Subpart F.

14) Subrecipient Requirements

Where AUTh carries out PHS/NIH-funded research through a subrecipient, collaborator, or consultant who meets the definition of Investigator, AUTh shall take reasonable steps to ensure compliance with 42 CFR Part 50, Subpart F. Investigators who are consultants or collaborators are subject to the FCOI requirements when they are responsible for the design, conduct, or reporting of the PHS/NIH-funded research.

Each written subaward or consortium agreement shall specify whether the subrecipient's Investigators will comply with the AUTh FCOI Policy or with the subrecipient's own FCOI policy.

If the subrecipient's own policy applies, the written agreement shall require the subrecipient to certify that its policy complies with the federal FCOI regulation and shall specify a reporting timeframe that allows AUTh to meet the applicable NIH reporting deadlines.

If the subrecipient institution, consultant, or collaborator cannot certify that it has an FCOI policy that complies with the federal regulation, the written agreement shall provide that the AUTh FCOI Policy applies and shall specify the period(s) within which the relevant Investigators must submit required SFI disclosures to AUTh. Those period(s) shall allow sufficient time for the Research Committee of AUTh to complete review and management and for AUTh to meet all applicable reporting deadlines.

Where AUTh is itself a subrecipient, AUTh shall comply with the FCOI provisions and reporting timeframes in the written agreement with the prime recipient and shall provide the disclosures, certifications, and reports necessary to enable the prime recipient to comply with its PHS/NIH obligations.

15) Maintenance of Records

AUTh shall maintain records of all Investigator disclosures of financial interests, institutional review and response to those disclosures whether or not they resulted in an FCOI, Management Plans, monitoring documentation, FCOI reports, retrospective reviews, mitigation reports, training records, and related institutional determinations.

Copies of FCOI Management Plans shall be retained as part of the institutional record-maintenance requirements. Management Plans themselves shall not be submitted to NIH unless specifically requested; FCOI reports shall instead include the key elements of the applicable Management Plan as required by NIH.

Records shall be retained for at least three (3) years from the date of submission of the final expenditure report, or for longer periods where required by 2 CFR 200.334, litigation, claim, audit, applicable law, award terms, or institutional requirements.

SFI disclosures and associated documentation shall be treated as confidential institutional records. Access shall be limited to persons whose institutional duties require access, subject to disclosure obligations imposed by PHS/NIH regulations and other applicable law.

Personal data shall be processed in accordance with Regulation (EU) 2016/679 (GDPR), applicable Greek legislation, and AUTh data-protection policies.

16) Enforcement Actions for Investigator Noncompliance and Remedies for Noncompliance

Compliance with this Policy is a condition of participation in PHS/NIH-funded research for all applicable Investigators. Noncompliance includes, among other things, failure to submit a required disclosure, failure to disclose an applicable SFI or travel, failure to complete required training, provision of materially incomplete or inaccurate information, and failure to comply with an approved Management Plan.

Depending on the nature and seriousness of the noncompliance, the Research Committee of ELKE of AUTh may determine or recommend research-compliance measures within its competence, including corrective action, additional training or disclosure, enhanced monitoring, or restrictions on participation in the affected research. Any contractual, employment, administrative, disciplinary, or financial measure requiring action by another competent AUTh body shall be referred to that body in accordance with applicable institutional rules and law.

AUTh shall also take all actions required under applicable federal regulations and sponsor requirements, including retrospective review, mitigation measures, notifications, and cooperation with PHS/NIH inquiries. Upon request, and subject to applicable law, AUTh shall promptly provide or make available records relevant to compliance with the FCOI regulation.

17) Useful FCOI and NIH Resources

- NIH Financial Conflict of Interest: https://grants.nih.gov/policy-and-compliance/policy-topics/fcoi
- NIH FCOI Training: https://grants.nih.gov/policy-and-compliance/policy-topics/fcoi/fcoi-training
- 42 CFR Part 50, Subpart F: https://www.ecfr.gov/current/title-42/chapter-I/subchapter-D/part-50/subpart-F
- NIH eRA Commons FCOI Module: https://www.era.nih.gov/
- NIH FCOI compliance inquiries: FCOICompliance@mail.nih.gov

18) Point of Contact

Questions concerning this Policy, Investigator disclosure obligations, training, or administrative procedures should be directed to:

Proposal Submission Office
Aristotle University of Thessaloniki

Email: proposals@rc.auth.gr

Tel.: +302310994044

The current contact details of the Proposal Submission Office shall be published together with the approved Policy on the official AUTh / Research Committee of AUTh web presence and shall be used for FCOI correspondence and written public-information requests.