

# Financial Conflict of Interest (FCOI) Policy

**Company Name:** Urban Design 4 Health, Inc. ([www.ud4h.com](http://www.ud4h.com))

**Date:** December 13, 2025

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## 1. Regulatory Basis

This policy implements the requirements of 42 CFR Part 50, Subpart F, Promoting Objectivity in Research, applicable to Public Health Service (PHS)-funded research.

## 2. Applicability

This policy applies to all Investigators, including the Principal Investigator and any other individuals responsible for the design, conduct, or reporting of PHS-funded research conducted by Urban Design 4 Health, Inc. ("UD4H"), including subrecipient Investigators where applicable.

## 3. Definitions

### **Investigator**

Any individual, regardless of title or position, who is responsible for the design, conduct, or reporting of PHS-funded research.

### **Significant Financial Interest (SFI)**

A financial interest of the Investigator (and the Investigator's spouse and dependent children) that reasonably appears related to the Investigator's institutional responsibilities, including:

- **Publicly traded entities:** Remuneration and equity interests exceeding \$5,000 in the preceding 12 months (aggregated)
- **Non-publicly traded entities:** Remuneration exceeding \$5,000 in the preceding 12 months, or any equity interest
- **Intellectual property rights and interests,** upon receipt of income
- **Reimbursed or sponsored travel,** excluding travel reimbursed or sponsored by a U.S. federal, state, or local government agency; U.S. institution of higher education; academic teaching hospital; medical center; or research institute affiliated with an institution of higher education

### **Exclusions:**

Institutional salary; income from mutual funds or retirement accounts where the Investigator

does not directly control investment decisions; income from seminars, lectures, or teaching engagements sponsored by U.S. government or academic institutions; and income from advisory services to U.S. government or academic institutions.

#### **Financial Conflict of Interest (FCOI)**

A Significant Financial Interest that could directly and significantly affect the design, conduct, or reporting of PHS-funded research.

## **4. Disclosure Requirements**

Investigators must disclose all Significant Financial Interests:

- Prior to submission of a PHS funding application
- Annually during the period of award
- Within 30 days of discovering or acquiring a new Significant Financial Interest

Disclosures of reimbursed or sponsored travel must include the purpose of the trip, the identity of the sponsor, the destination, and the duration.

## **5. Review and Management**

UD4H reviews all disclosed Significant Financial Interests to determine whether a Financial Conflict of Interest exists prior to the expenditure of PHS funds.

If an FCOI is identified, UD4H will:

- Develop and implement an appropriate management plan
- Monitor Investigator compliance with the management plan through the completion of the research project

## **6. Reporting to the Public Health Service**

UD4H will report Financial Conflicts of Interest to the PHS awarding component:

- Prior to the expenditure of funds
- Within 60 days of identifying a new FCOI
- At least annually, in conjunction with the progress report, if applicable

## **7. Subrecipients**

Subaward agreements will include written terms establishing whether this policy or the subrecipient's FCOI policy applies.

If the subrecipient's policy applies, the subrecipient must:

- Certify compliance with 42 CFR Part 50, Subpart F
- Report identified FCOIs to UD4H in sufficient time to allow UD4H to meet its PHS reporting obligations

## 8. Retrospective Review

In cases of noncompliance, UD4H will, within **120 days**, complete a retrospective review to determine whether bias occurred in the design, conduct, or reporting of the PHS-funded research.

If bias is found, UD4H will:

- Document the review
- Submit a mitigation report to the PHS awarding component

## 9. Training

Investigators must complete FCOI training:

- Prior to engaging in PHS-funded research
- At least every four (4) years
- Immediately when:
  - This policy is revised
  - An Investigator is new to the institution
  - Noncompliance with this policy is identified

## 10. Records

UD4H will maintain records of all disclosures and FCOI management actions for three (3) years from the date of submission of the final expenditure report, or longer if required by 45 CFR §74.53(b).

## 11. Public Access

This FCOI Policy is posted on a publicly accessible website at:

- <https://www.ud4htools.com/ContactUs.html>

In accordance with NIH requirements, information concerning identified Financial Conflicts of Interest will be made publicly available on a publicly accessible website within five (5) business days of a written request. Publicly accessible FCOI information will include:

- Investigator's name, title, and role on the research project
- Name of the entity in which the Significant Financial Interest is held

- Nature of the Significant Financial Interest
- Approximate dollar value of the interest (in specified ranges), or a statement that the value cannot be readily determined

Such information will remain available for three (3) years from the date it was most recently updated.

## 12. Enforcement

Failure to comply with this policy may result in corrective actions, including modification of management plans, increased oversight, suspension of research activities, or other administrative measures, as appropriate. Noncompliance may be reported to the PHS awarding component and may result in funding sanctions.

**Approved by:**



James Chapman, Managing Principal  
Signing Official  
Urban Design 4 Health, Inc.