

NIH Financial Conflict of Interest (FCOI) Policy

For [Skyline Sober Living Network](#)

Skyline Sober Living Network

Financial Conflict of Interest (FCOI) Policy

Applicable to Public Health Service (PHS) / NIH Funded Activities

Effective Date: May 27, 2026

1. Purpose

Skyline Sober Living Network (“Skyline”) is committed to maintaining the highest standards of integrity, transparency, and objectivity in all federally funded activities. This Financial Conflict of Interest (“FCOI”) Policy is established to comply with applicable federal regulations, including 42 CFR Part 50 Subpart F, “Promoting Objectivity in Research,” and related Public Health Service (“PHS”) and National Institutes of Health (“NIH”) requirements.

This policy is intended to ensure that the design, conduct, reporting, and administration of federally funded activities are free from bias resulting from financial conflicts of interest.

2. Scope

This policy applies to:

- officers,
- directors,
- employees,
- consultants,
- contractors,
- investigators,
- program directors,
- and any individual responsible for the design, conduct, reporting, or administration of federally funded activities conducted on behalf of Skyline.

This policy applies to all PHS-funded grants, cooperative agreements, and other federally supported activities subject to applicable FCOI regulations.

3. Policy Statement

Skyline requires all covered individuals to disclose significant financial interests that could directly and significantly affect, or reasonably appear to affect, the objectivity of federally funded activities.

Skyline prohibits undisclosed financial conflicts from influencing organizational decision-making, grant administration, procurement, program oversight, or federally supported activities.

4. Definitions

A. Financial Conflict of Interest (FCOI)

A Financial Conflict of Interest exists when Skyline determines that a Significant Financial Interest could directly and significantly affect the design, conduct, reporting, or administration of federally funded activities.

B. Significant Financial Interest (SFI)

A Significant Financial Interest includes:

- compensation,

- consulting fees,
- equity interests,
- ownership interests,
- intellectual property rights,
- reimbursed or sponsored travel,
- or other financial relationships

that reasonably appear related to an individual's organizational responsibilities or federally funded activities.

Excluded interests may include:

- salary paid by Skyline,
 - publicly traded mutual funds,
 - retirement accounts,
 - and other exclusions permitted under federal regulations.
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5. Disclosure Requirements

Covered individuals must disclose Significant Financial Interests:

- upon initial appointment or engagement,
- annually thereafter,
- within thirty (30) days of acquiring a new Significant Financial Interest,
- and prior to participating in federally funded activities when applicable.

Disclosures shall be submitted to Skyline's designated compliance or reviewing authority.

6. Review and Determination

Skyline shall review all disclosed Significant Financial Interests to determine whether:

- a Financial Conflict of Interest exists,
- the interest could affect objectivity,
- and whether management, reduction, or elimination measures are required.

The organization may request additional information as necessary to complete its review.

7. Management of Financial Conflicts

When a Financial Conflict of Interest is identified, Skyline may implement management measures including:

- public disclosure of conflicts,
- recusal from decision-making,
- independent review or oversight,
- modification of responsibilities,
- monitoring plans,
- or other corrective actions deemed appropriate.

Failure to comply with management requirements may result in disciplinary or corrective action.

8. Training

Individuals subject to this policy shall complete Financial Conflict of Interest training as required by applicable federal regulations and organizational procedures prior to engaging in covered federally funded activities.

Additional training may be required:

- every four (4) years,
 - when policy revisions occur,
 - or when noncompliance is identified.
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9. Record Retention

Skyline shall maintain records relating to:

- disclosures,
- reviews,
- determinations,
- management plans,
- and related actions

for a minimum period required under applicable federal regulations and grant conditions.

10. Public Accessibility

In accordance with applicable NIH and PHS requirements, this policy shall be maintained on a publicly accessible website.

11. Enforcement and Noncompliance

Failure to disclose Significant Financial Interests or comply with this policy may result in:

- corrective action,
- removal from federally funded activities,
- disciplinary measures,
- or other actions deemed appropriate by Skyline.

Skyline reserves the right to conduct retrospective reviews and implement mitigation measures where required under federal regulations.

12. Contact Information

Questions regarding this policy may be directed to:

Skyline Sober Living Network

Westminster, California

[Skyline Sober Living Network](#)

Board Approval

This policy was adopted by the Board of Directors of Skyline Sober Living Network and shall remain in effect until modified or rescinded by formal board action