Subrecipients Under PHS Applications

The federal regulation on financial conflict of interest in research also applies to investigators at organizations proposed for subcontracting (subrecipients), **who are considered to be "key personnel" by the USA Principal Investigator**, under PHS-funded research.

NOTE: The subrecipient organization is required to either have its own conflict of interest policy that complies with the federal regulation, or follow the University's Conflict of Interest policy.

The Federal Demonstration Partnership (FDP) has developed a directory, called the Clearinghouse, which lists research organizations that have certified that they comply with the federal conflict of interest requirements.

Follow these steps as you begin the routing process for the PHS application:
Standard Operating Procedures: Processes for Subrecipients (A Guide for USA PIs and Grant Administrators)

Forms and Information

Subrecipient Instruction and Forms Packet

- Letter of Instruction (PDF)
- Subrecipient Financial Conflict of Interest Commitment Form (FORM 1) (PDF - Adobe Acrobat Required)
- Financial Disclosure Requirements- Subrecipient Disclosure of Financial Interest in Research form (FORM 2) (PDF - Adobe Acrobat Required)
    - These forms are only required for ***subrecipient investigators*** that are not listed on the Federal Demonstration Partnership (FDP) Clearinghouse list. An invitation to join the FDP list of PHS FCOI compliant institutions is encouraged. Note that ONLY an authorized organizational representative from the organization can add their institution's name to the list.
    - One form must be completed for each subrecipient investigator meeting the definition of "investigator"
        - "Investigator" means a project director or any other person, regardless of position or title, who is responsible for the design, conduct, or reporting or research funded by the Public Health Service (PHS), or for a proposal seeking such funding. Since title and position are not indications of who is an "Investigator" as defined by PHS, it is possible for students and postdocs to meet this definition. Senior or key personnel listed on a proposal/award may be considered an Investigator for purposes of submitting a conflict of interest disclosure form. Senior/key personnel are considered to be individuals who have the authority to make independent decisions about the direction of the research and the subsequent conclusions about the results. This does not

include administrative personnel or individuals who perform routine, pre-defined, or incidental tasks related to the project.

- Disclosure must be on file before the Office of Sponsored Projects Administration can submit the proposal to a PHS agency or designated Non-PHS agency that is compliant with PHS Conflict of Interest regulations.

FDP Model Financial Conflict Of Interest Policy And Model Disclosure Form (for potential adoption by subrecipients not yet having their own FCOI policy)

The model policy and form listed below is intended to assist subrecipients who wish to create their own Financial Conflict of Interest policy. This model policy has been developed by members of the FDP who are familiar with PHS Financial Conflict of Interest requirements; however, subrecipients are independently responsible for conducting their own review to ensure that this model or an adapted version is compliant with PHS policy. Tools are available on the NIH web site to assist institutions with this process, including:

- Checklist for Policy Development (PDF)
- FCOI tutorial (grants.nih.gov)