

REVISED DATE: 12/22/2025

Collaborators from other organizations who will be conducting research under a sub-grant or subcontract (Subrecipients) from the University of Rhode Island (URI) and who share responsibility for the design, conduct, or reporting (DCR) of research results must comply with relevant Financial Conflict of Interest (FCOI) and Conflict of Commitment regulations and expectations. Two options exist to fulfill these requirements. Subrecipients may:

1. comply with their own institution's compliance policies and procedures for disclosure and review of Significant Financial Interests (SFIs) and Outside Activities; or
2. comply with URI's policies and procedures for disclosure and review of SFIs and Outside Activities, if their organization does not have policies that comply with sponsor requirements.

### ***How will this affect you?***

#### *At Time of Proposal Submission*

Subrecipients must complete the URI Research Subrecipient Monitoring Form. This form asks the Subrecipient to either certify their organization has policies that comply with the relevant regulations or state they will comply with URI's policies. For PHS awards, the FCOI policy must be compliant with the PHS FCOI Regulation. If the Subrecipient certifies they are following their own policy, no further action is needed.

If the subrecipient organization intends to abide by URI's policies, they will need to contact the URI Office of Research Integrity (ORI) for information about disclosure and training.

#### *When Just in Time or Notice of Award Notification is Received*

If the Subrecipient is complying with their own institution's policies, information on any conflicts requiring management must be submitted to the URI ORI to report to the funding agency.

If the Subrecipient is complying with URI's policies and the Subrecipient investigators have reported any SFIs or Outside Activities, the URI ORI must complete its review PRIOR to the issuance of the subaward contract.

#### *Ongoing Compliance for Subrecipients*

Subrecipient institutions must disclose to the URI ORI any new SFIs or Outside Activities that arise and are required to be managed during the life of the award.

Subrecipient investigators will be asked to certify annually whether there have been any changes to their SFIs or Outside Activities.

Subrecipient Investigators will be required to renew their training every four years.