

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) regulation. Two options exist to fulfill this requirement. Subrecipients may:

1. Comply with their own institution's FCOI compliance policies and procedures for disclosure and review of Significant Financial Interests (SFIs); or
2. Comply with the URI's FCOI in Research policy and procedures for disclosure and review of SFIs, if their organization does not have an FCOI policy that complies with sponsor regulations.

For more information about who qualifies as someone with DCR responsibilities, see the [Financial Conflicts of Interest in Research Quick Reference Guide](#).

### ***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 an FCOI policy that complies with the relevant FCOI regulation or state they will comply with URI's FCOI policy. For PHS awards, the FCOI policy must be compliant with the PHS FCOI Regulation. If the Subrecipient certifies they are following their own FCOI policy, no further action is needed.

If the subrecipient organization intends to abide by URI policy, 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 FCOI policy, 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 FCOI Policy and the Subrecipient investigators have reported any SFIs, 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 conflicts 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 status changes to any identified conflict (PHS awards only).

Subrecipient Investigators will be required to renew their training every four years (PHS awards only).