

Collaborators from other organizations who will be conducting research under a sub-grant or subcontract from the University of Rhode Island (URI) and who share responsibility for the design, conduct or reporting (DCR) of research results must comply with Public Health Service (PHS) Financial Conflict of Interest (FCOI) regulation. Two options exist to fulfill this requirement. They may:

1. Comply with their own institution's PHS FCOI compliance policies and procedures for disclosure and review of a Significant Financial Interests (SFI), or,
2. Comply with the URI's FCOI in Research policy and procedures for disclosure and review of a SFIs related to PHS sponsored awards, if their organization does not have a FCOI policy that complies with the PHS regulation.

For more information about who qualifies as someone with DCR responsibilities, see the FCOI Quick Reference Guide: <http://www.uri.edu/research-admin/office-of-research-integrity/>

## 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 a FCOI policy that complies with the 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:

1. Inform URI who has been deemed to be responsible for the design, conduct or reporting of the research.
2. Complete and submit the URI SFI Disclosure Form for each and submit to the URI Office of Sponsored Projects, and
3. Complete the URI COI training if funding source is PHS or other agency following PHS regulations.

### *When Just In Time (JIT) or Notice of Award Notification is Received*

If the Subrecipient is complying with their own organization's FCOI policy, information on any conflicts requiring management must be submitted to the URI ORI to report to the PHS agency.

If the Subrecipient is complying with URI's FCOI Policy and the Subrecipient Investigators have answered "Yes" to any of the questions on the URI SFI Disclosure form, the URI ORI must complete its review and if necessary, forward to the URI Conflict of Interest Management Committee PRIOR to the issuance of the subaward contract.

### *Ongoing Compliance for Subrecipients*

- Subrecipient organizations must disclose to the URI ORI any FCOIs 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 FCOI (PHS awards only).
- Subrecipient Investigators will be required to renew their training every four years (PHS awards only).

### *Available Resources:*

URI Office of Research Integrity:  
<https://web.uri.edu/research-admin/office-of-research-integrity/>

NIH Resources  
[http://grants.nih.gov/grants/policy/coi/coi\\_faqs.htm](http://grants.nih.gov/grants/policy/coi/coi_faqs.htm)