

Financial Conflicts of Interest and Subrecipients

The U.S. Public Health Service (PHS) has a regulation (42 CFR Part 50 Subpart F and 45 CFR Part 94) regarding Objectivity in Research. The National Science Foundation's Grantee Standards also address objectivity in research. These regulations and guidelines impact proposals being submitted to PHS agencies, other organizations that have adopted the PHS regulations, and to the NSF (for a complete list of agencies that follow the PHS regulation please see:

<https://www.usf.edu/research-innovation/research-integrity-compliance/ric-programs/conflict-of-interest/coi-terms.aspx>). In order to comply with these regulations and policies, the following procedures must be followed *prior* to submission of an NSF, PHS or other agency proposal:

1. For PHS projects, as soon as you know of a proposed subrecipient, check the FDP FCOI Clearinghouse at <http://thefdp.org/default/fcoi-clearinghouse/compliant-entities/> to see if that subrecipient is on the FDP's "List of Compliant Institutions and Entities." If it is, it has a PHS-compliant policy on conflicts of interest and no further action is required.
2. If the proposed subrecipient is NOT on the FDP Clearinghouse or the submission is for an NSF-funded proposal, you must notify the subrecipient that they need to complete Form A and possibly Form B, a financial disclosure form. Both Forms are webforms, so can be completed and submitted online (instructions and a link to the Forms are available at this website: <http://www.research.usf.edu/dric/conflicts-of-interest/subrecipient-fcoi-policy.asp>). If a subrecipient is unable to complete the web forms, PDF versions are available on this site.
3. If the proposed subrecipient selects that it has a PHS or NSF-compliant COI policy on Form A, then the subrecipient must follow its institution's own COI policy, and there is no need for the subrecipient Investigators from that entity to complete Forms B (financial disclosure forms).
4. If the proposed subrecipient selects that its institution does NOT have a PHS or NSF-compliant COI policy, then the subrecipient Investigators will be required to follow USF's FCOI policy (Policy No. 0-309). In this case, names of all subrecipient Investigators expected to work on the subaward must be listed on Form A AND each Investigator must complete a Form B.

Please note that all requirements of the PHS regulation or NSF Grantee Standards (whichever is applicable based on the funding source), including the process detailed above, MUST be met BEFORE submission of the proposal and BEFORE any funds can be disbursed at Notice of Award.