

UNIVERSITY OF SOUTH ALABAMA

PHS FINANCIAL CONFLICT OF INTEREST SOPs: PROCESSES FOR SUBRECIPIENTS

Effective August 24, 2012

Principal Investigators,

The University must obtain verification from each proposed subrecipient before proposal is submitted whether the proposed subrecipient has their own PHS-compliant financial conflict of interest policy or, if they don't have their own policy that they will agree to comply by the Prime's policy and process.

Business Process: Submission of a New/Renewal PHS Proposal

For new and renewal proposals that the University submits to any [PHS agency or designated non-PHS agency](#) the Principal Investigator shall:

1. Check to see if your proposed subrecipient is listed on the FDP Clearinghouse designating PHS FCOI compliant institutions at: http://sites.nationalacademies.org/PGA/fdp/PGA_070596 If your subrecipient is on the FDP list you will need to:
 - Indicate the subrecipient organization is listed in the FDP Clearinghouse on the University Transmittal Sheet as outlined in the Conflict of Interest section.

OR

2. If your proposed subrecipient is **NOT** listed on the FDP Clearinghouse of PHS FCOI compliant institutions, SEND the Subrecipient letter/forms packet during proposal development well in advance of the proposal deadline. This "packet" includes a letter of instruction, a subrecipient financial conflict of interest policy commitment form (Form 1), and disclosure requirements (Form 2). The forms should be returned to the Principal Investigator/Departmental Grants Administrator **prior** to routing the grant proposal. The packet is located on the "**Subrecipient Financial Conflict of Interest Resource Repository**" website at: <http://www.southalabama.edu/researchcompliance/phsrepository.html> The proposal cannot be submitted unless the forms are complete and routed with the proposal submission.

The subrecipient organization should be invited to sign on the FDP Clearinghouse list if they have a PHS FCOI compliant policy. The invitation is posted on the "**Subrecipient Financial Conflict of Interest Resource Repository**" website at: <http://www.southalabama.edu/researchcompliance/phsrepository.html>

If eligible, once the institution is posted on the Clearinghouse the subrecipient should notify the USA Principal Investigator or departmental administrative contact. You may proceed with Step 1 above to verify the subrecipient organization now appears on the PDF Clearinghouse. If the subrecipient organization is **not** eligible to join the list, the subrecipient forms (Forms 1 and 2) must be submitted by ALL PHS subrecipients prior to proposal submission.

NOTE: If the subrecipient indicates they will follow USA's policy, each subrecipient individual meeting PHS's definition of an investigator (individual responsible for the design, conduct or reporting of the research) must also complete and return an Subrecipient Disclosure form (Form 2) provided in the "packet" **BEFORE** the proposal is submitted to a PHS agency. The Subrecipient Financial Conflict of Interest Commitment form (Form 1) will be used to identify the Subrecipient PI and any key personnel who must disclose.

Business Process: Just-in-Time and At Time of Award

If the proposed subrecipient is using USA's policy and any of its investigators has a positive disclosure of financial interests, the VP for Research will conduct a review and if needed, create a conflict management plan, prior to any expenditure of funds by the subrecipient. The Office of Research Compliance and Assurance will coordinate the review, which will be triggered at the just-in-time phase as guided by the Office of Health Systems Grants Administration or notice of award guided by the Office of Grants Administration. The Office of Grants Administration cannot issue a subaward or a subaward modification until all positive disclosures have been reviewed. Additionally, the Subrecipient PI and key personnel meeting the definition of investigator and using USA's policy must complete conflict of interest training prior to a subaward being issued. This requirement is outlined in the Subrecipient letter/forms packet.