

UNIVERSITY OF SOUTH ALABAMA
(FOR PHS PROJECTS AND NON-PHS ORGANIZATIONS APPLYING PHS REQUIREMENTS)

**DOCUMENTATION OF PUBLIC HEALTH SERVICE (PHS)
SUBRECIPIENT FINANCIAL CONFLICT OF INTEREST (FCOI) POLICY**

Instructions:

These instructions and the attached forms are required because your organization has been identified as a subrecipient on a proposal that the University of South Alabama (USA) plans to submit for funding to a PHS* agency or Non-PHS** agency applying PHS FCOI requirements. The PHS FCOI regulations require the Prime Institution to collect certain information from subrecipients at the time of proposal submission and during the award period.

Step 1: If your institution/organization has a PHS FCOI compliant policy and/or is listed on the [Federal Demonstration Partnership \(FDP\) Clearinghouse](#) list, you do not need to complete the forms outlined in Steps 1 and 2 below. Please inform the Principal Investigator or Departmental Grants Administrator at the Prime Institution. If you have additional questions please contact Dusty Layton, dlayton@usouthal.edu or call 251-460-6625 before proceeding with completion of forms.

Steps 2 and 3 are required only if Section 2, box 2 of Form 1 is checked.

Step 2. Step 2 is required for ALL PHS and designated Non-PHS proposals that are **not** listed on the FDP Clearinghouse list. Please complete, sign and return the "Documentation of PHS Subrecipient Financial Conflict of Interest" form (Form 1) to the Principal Investigator at USA. This form **MUST** be on file before USA can submit a proposal containing the proposed subaward.

Step 3. If (and only if) Section 2, box 2 of Form 1 is checked indicating the University of South Alabama's Financial Conflict of Interest policy will be followed (i.e., your organization does not have its own financial conflict of interest policy), then EACH subrecipient investigator (defined as a person responsible for the design, conduct or reporting of the research proposed under the subaward) must be identified on Form 1. EACH subrecipient investigator and subrecipient key personnel must also complete, sign, and return the "Subrecipient Disclosure of Financial Interest in Research" form (Form 2) to USA. All disclosure form(s) must be on file before USA can submit a proposal containing your proposed subaward. Please return the completed forms with your proposal to the Principal Investigator at USA for routing with the project proposal.

Step 4. Every investigator who completes a disclosure form (Form 2) must also complete Financial Conflict of Interest training before any PHS funds are expended (i.e., before any subaward can be issued) and again once every 4 years. The Collaborative Institutional Training Initiative (CITI) online training program can be found at: www.citiprogram.org/ Please affiliate your training with the University of South Alabama.

PHS Agencies*

Office of the Assistant Secretary for Health (OASH)
Office of the Assistant Secretary for Preparedness and Response (ASPR)
Office of Global Affairs (OGA)
Agency for Healthcare Research and Quality (AHRQ)
Agency for Toxic Substances and Disease Registry (ATSDR)
Centers for Disease Control (CDC)

Food and Drug Administration (FDA)
Health Resources and Services Administration (HRSA)
Indian Health Service (IHS)
National Institutes of Health (NIH)
Substance Abuse & Mental Health Services Adm (SAMHSA)

Non-PHS Organizations**

American Heart Association American Cancer Society Susan G Komen for the Cure

USA's financial conflict of interest policy is posted at:
<http://www.southalabama.edu/researchcompliance/conflict.html>