

UW-Extension

Process for Including Subrecipients on U.S. Public Health Services (PHS) Funded Proposals and Awards Based on [UWEX Conflict of Interest Policy for PHS-Funded Projects](#)

The [U.S. Public Health Service \(PHS\)](#) has changed its policies regarding financial conflict of interest (FCOI), effective August 24, 2012. This new policy impacts our investigators as well as our subrecipients on PHS-funded sponsored programs.

As of August 24, **prior to proposal submission**, UW-Extension must obtain information from each proposed subrecipient about whether the subrecipient (1) has its own PHS-compliant FCOI policy or (2) does not have a policy and will agree to abide by [UW-Extension's Conflict of Interest Policy for PHS-Funded Projects](#).

Submission of a New or Renewal PHS Proposal:

For new and renewal proposals that will be submitted to any PHS agency on or after August 24, 2012 that include one or more subrecipients, please: **Check to see if your proposed subrecipient is listed on the FDP Clearinghouse of PHS FCOI Compliant Institutions.** http://sites.nationalacademies.org/PGA/fdp/PGA_070596

Option #1: Subrecipient is in the Clearinghouse. If your subrecipient is on the Clearinghouse list, just add a note in the WISPER comments tab with the name of the subrecipient, such as: University of Minnesota on the FDP Clearinghouse List. You do not need to do anything else. No other forms are needed.

Option #2: Subrecipient is NOT in the Clearinghouse. If your subrecipient is NOT on the FDP Clearinghouse of PHS FCOI Compliant Institutions, please send out as early as possible the Subrecipient FCOI Documentation. You can also strongly encourage the subrecipient to sign up on the FDP Clearinghouse: http://sites.nationalacademies.org/PGA/fdp/PGA_070596. If the subrecipient does join the Clearinghouse, then Option #1 above can be used.

Option #2A: Subrecipient is NOT in the Clearinghouse but will use its own FCOI policies. If the subrecipient does not sign up with the FDP Clearinghouse but does intend to use its own policies for financial conflict of interest, then the [Subrecipient FCOI Documentation Form](#) must be completed and uploaded to the WISPER attachment tab before the proposal is submitted. No other action is necessary.

Option #2B: Subrecipient is NOT in the Clearinghouse and does NOT have its own FCOI policies. If the subrecipient does not have PHS-compliant conflict of interest policies and opts to use UW-Extension's FCOI policy, then the subrecipient must complete the [Subrecipient FCOI Documentation Form](#), and all subrecipient investigators must submit a completed [Outside Activity Report](#) to be reviewed by UW-Extension's Institutional Official. Copies of these OARs and the Subrecipient FCOI Documentation Form must all be uploaded to the WISPER record before the proposal is submitted. Division contacts, please check the WISPER record for these documents before forwarding to OES for review.

Process at the Time of Award

If the proposed subrecipient is using the University's policy and any of its investigators have a positive disclosure of financial interests, the Institutional Official (IO) must complete its review and, if necessary, create a conflict management plan, prior to the subrecipient's expenditure of any grant funds. OES will coordinate with the respective IO on monitoring this review, which could begin as early as notification of a Just-in-Time (JIT) phase if we know of a JIT review. Otherwise, OES will trigger the COI review at the time a Notice of Grant Award is received. We cannot issue a subaward until all positive disclosures have been reviewed by the IO.