



## Dartmouth College

Office of Sponsored Projects  
11 Rope Ferry Road, HB 6210  
Hanover, NH 03755-1404

TELEPHONE (603) 646 - 3007  
FAX (603) 646 - 9694  
EMAIL: [sponsored.projects@dartmouth.edu](mailto:sponsored.projects@dartmouth.edu)

## Documentation of Subrecipient Financial Conflict of Interest Policy (use for PHS funded projects only)

Dear Potential Subrecipient:

You are receiving this letter and the attached form because you are a proposed subrecipient on a proposal that Dartmouth College intends to submit for funding from a Public Health Service agency or another sponsor that has adopted PHS conflict of interest rules. The PHS Conflict of Interest regulations require us to collect certain information from you at time of proposal, and during the life of the award.

- If your organization is compliant with the updated PHS Financial Conflict of Interest (FCOI) regulation **and** has enrolled in the FDP Clearinghouse\* of institutions compliant with these regulations, please include a cover letter with your subcontract proposal to indicate enrollment in the clearinghouse.
- If your organization is not enrolled in the FDP COI Clearinghouse, **please complete the attached form and include it with the subcontract proposal for review** by the Dartmouth Office of Sponsored Projects..

Thank you in advance for your cooperation. If you have any questions, we encourage you to contact your organization's business official or office of sponsored projects. They may be able to assist you in making determinations concerning your organization's policies.

### Resources:

Information regarding the PHS regulations may be found at: <http://www.gpo.gov/fdsys/pkg/FR-2011-08-25/pdf/2011-21633.pdf>

\*If your organization is compliant with the updated PHS Financial Conflict of Interest (FCOI) regulations, we encourage you to enroll your organization in the FDP Clearinghouse of institutions compliant with these regulations. Your organization does not have to be an FDP member to enroll in the Clearinghouse, and enrollment takes about two minutes. Information concerning the clearinghouse can be found at [http://sites.nationalacademies.org/PGA/fdp/PGA\\_070596](http://sites.nationalacademies.org/PGA/fdp/PGA_070596).

If you have any questions concerning this form or the subcontract process at Dartmouth College, please contact [sponsored.projects@dartmouth.edu](mailto:sponsored.projects@dartmouth.edu)

Last revised February 27, 2013



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## Dartmouth College – Office of Sponsored Projects

### PHS FORM 1

(Required when proposing a subaward for a PHS-funded project)

1. Subrecipient Legal Name:	
2. Subrecipient Address: (Include ZIP Code/Postal Code)	
3. Subrecipient DUNS #:	
4. Dartmouth College PI:	
5. Subrecipient PI:	
6. Prime Sponsor:	
7. Proposal/Project Title:	
8. Subaward Period of Performance:	

Please check one of the following:

**A:** The Subrecipient has implemented and is enforcing a written policy of financial conflict of interest compliant with the Public Health Service (PHS) Conflicts of Interest regulations (42 CFR Part 50, Subpart F and 45 CFR Part 94). I certify that all Subrecipient Investigators (individuals responsible for the design, conduct or reporting of research for the proposal) have made the required disclosures to the Subrecipient's institutional official in accordance with the Subrecipient's policy.

**B:** The Subrecipient has not implemented a written policy of financial conflict of interest compliant with the Public Health Service (PHS) Conflicts of Interest regulations (42 CFR Part 50, Subpart F and 45 CFR Part 94). I certify that the Subrecipient will perform the following steps:

- 1) establish a conflict of interest policy in compliance with the PHS Conflicts of Interest regulations, including the implementation of a disclosure requirement for all Subrecipient Investigators, in advance of the receipt of the award. This disclosure requirement will mandate the submission of updated disclosures from Subrecipient Investigators within 30 days of discovering or acquiring (e.g., through purchase, marriage, or inheritance) a new SFI (including any SFIs that arise between the time the proposal is submitted and an award is made), within 30 days of the occurrence of reimbursed or sponsored travel as specified in the PHS Conflict of Interest regulations, and at least annually during the period of award;
- 2) establish a process to collect, review and manage Subrecipient Investigator disclosures of SFIs (including those of an Investigator's spouse and dependent children), that are related to the research being conducted under the subaward, and report financial conflicts of interest to Dartmouth College sufficiently in advance of the award receipt date for Dartmouth to submit FCOI agency reports as required in the PHS Conflict of Interest regulations;
- 3) assure that Investigators fulfill the PHS COI Training Requirement in advance of the receipt of the award.

If I require assistance or clarification any of the above I will contact the Office of Sponsored Projects at [sponsored.projects@dartmouth.edu](mailto:sponsored.projects@dartmouth.edu) or the Dartmouth COI Officer at [rcoi@dartmouth.edu](mailto:rcoi@dartmouth.edu) .

I certify that the information listed above is true, complete and accurate to the best of my knowledge, and that I am an Authorized Organizational Official for my institution. The appropriate programmatic and administrative personnel involved in this disclosure are aware of agency policy in regard to subawards and are prepared to establish the necessary inter-institutional agreements and/or FCOI management plans consistent with those policies.

Signature: \_\_\_\_\_ email: \_\_\_\_\_

Date: \_\_\_\_\_ Name: \_\_\_\_\_ Title: \_\_\_\_\_