



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

Guidance to Principal Investigators, Department Administrators and OSP

Documentation for Collaborators (Subrecipients and Consultants)

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

Subrecipients

The memo describing the “**Documentation of Subrecipient Financial Conflict of Interest Policy**” and the attached form should be provided to all subrecipient institutions that will participate in a grant application to any agency of the Public Health Service (e.g. NIH, AHRQ, SAMSHA). For a complete list of sponsors who have adopted PHS conflict of interest rules, please refer to the OSP website at [Sponsors PHS Rules](#).

- Provide each Subrecipient with the Dartmouth Documentation of Subrecipient Financial Conflict of Interest Cover Letter and Form
- Collect either a Letter of Intent or other appropriate form (can be subcontractor’s form) that certifies compliance with PHS Conflict of Interest regulations OR collect Dartmouth College form **PHS Form 1**
- Submit either form of documentation to OSP, along with other required subcontractor forms (budgets, etc).

Consultants

Under PHS FCOI rules, Dartmouth is required to collect disclosures from any *Investigator*.

- A) Investigator** means the project director or principal Investigator and any other person, regardless of title or position, who is **responsible** for the design, conduct, or reporting of research funded by the PHS, or proposed for such funding, which may include, for example, collaborators or consultants. ([PHS regulation August 2011](#))
- B) Subrecipient versus Consultant:** Consultants are usually independent contractors or researchers performing work outside of their responsibilities to their employer. If the individual is performing services that relate to their employment responsibilities, it may be more appropriate to classify the arrangement as a subrecipient.

Dartmouth PI to review:

1. The individual(s) is/are bona fide consultant versus subrecipient
 - If yes, review 2. and 3. below.
 - If no, collect subrecipient documentation.
2. The individual is a bona fide consultant and meets the definition of **Investigator** (see above):
 - If yes, collect Dartmouth **PHS Form 2** and submit with grant application to OSP
3. The individual is a bona fide consultant, but **only contributes expertise on a limited basis** (e.g. 10 hours/year) and does not meet the definition of **Investigator** (above)
 - If yes, PI certifies determination via email to OSP.

If you have any questions concerning this form or the subcontract process at Dartmouth College, please contact the Director of OSP, your OSP Grants Officer or the COI Officer at rcoi@dartmouth.edu.