

**UNIVERSITY OF COLORADO DENVER
NEW PHS/NIH CONFLICT OF INTEREST RULES!
PROCEDURES FOR SUBRECIPIENTS**

EFFECTIVE AUGUST 24, 2012

If a subcontract is to be part of a proposal, following are procedures to follow to satisfy the PHS/NIH COI Policy:

1. During proposal preparation – check the status of an institution’s Conflict of Interest Policy at this website:

http://sites.nationalacademies.org/PGA/fdp/PGA_070596

If the institution is listed on the website, you do not need to do anything else to satisfy the NIH COI policy as it relates to subrecipients.

2. If the institution is not in the FDP website of approved COI plans, the attached form must be completed by the proposed subrecipient and accompany the proposal documentation submitted to OGC PreAward. This form can be e-mailed and completed electronically.

3. If the institution does not have a COI plan, the individuals who will serve in key personnel roles, will be required to file a COI with the University of Colorado Denver COI office. That will be accomplished by identifying them as POIs. This process will be coordinated by the CU Denver COI Office and can take up to 5 days.

Questions?

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