

SUBRECIPIENT FINANCIAL CONFLICT OF INTEREST DISCLOSURE FORM – AWARD

The United States Public Health Service (PHS) Financial Conflict of Interest (FCOI) policy (effective August 24, 2012) mandates that Allina Health determine if a subrecipient has a PHS-compliant FCOI policy, and also requires the subrecipient to disclose certain information should a FCOI be present.

Allina Health will collect this information prior to issuing a subaward agreement, and then annually at the time of renewal.

Subrecipient Information

Subrecipient Legal Name: _____

PI name: _____

PI email address: _____

PI phone number: _____

FCOI contact information (if different from PI):

Institutional Financial Conflict of Interest Information

My organization **DOES HAVE** a PHS-compliant Financial Conflict of Interest (FCOI) policy and my organization will rely on this policy and associated procedures to comply with PHS Conflict of Interest regulation.

____ **Yes** or ____ **No:** We are registered as an organization with a PHS-compliant FCOI policy with the FDP.
Clearinghouse: http://sites.nationalacademies.org/PGA/fdp/PGA_070596.

My organization **DOES NOT HAVE** a PHS-compliant Financial Conflict of Interest (FCOI) policy.

____ **Yes** or ____ **No:** My organization agrees to rely on Allina Health's Research and Sponsored Programs Conflict of Interest policy and procedures to comply with PHS Conflict of Interest regulations.
Note: Organizations checking this option are required to follow Allina Health's COI and FCOI policies and procedures.

Project Specific Financial Conflict of Interest Information

Title of Proposal: _____

_____ **NO** - conflicts of interest need to be disclosed at this time.

_____ **YES** - there are conflicts of interest to be disclosed. **For each of the investigators on this project with a positive FCOI, please included the data requirements listed on page 2.**

Signature

Signature of Subrecipient's Authorized Official: _____

Date: _____

Name of Authorized Official: _____

Title: _____

SUBRECIPIENT FCOI DISCLOSURE FORM

If there is a positive FCOI, please complete the following data requirements:

Grant number: _____

PD/PI or contact PD/PI: _____

Name of Investigator with the FCOI: _____

Name of the entity(s) with which the Investigator has an FCOI

Nature of FCOI (e.g., equity, consulting fees, travel reimbursement, honoraria)
Value

Allina Health System
Office of Sponsored Programs
2925 Chicago Avenue, MC 10105
Minneapolis, MN 55440-0043
OSP@allina.com

Value of the financial interest \$0-\$4,999; \$5,000-\$9,999; \$10,000-\$19,999; amounts between \$20,000-\$100,000 by increments of \$20,000; amounts above \$100,000 by increments of \$50,000, or a statement that a value cannot be readily determined.

Provide a description how the financial interest relates to NIH-funded research and the basis for the Institution's determination that the financial interest conflicts with such research.

Provide the key elements of the Institution's management plan.