Institutions Participating in the FDP FCOI Clearinghouse

Institutions participating in the Federal Demonstration Partnership (FDP) Financial Conflict of Interest (FCOI) Clearinghouse do not submit FCOI forms or complete the training requirements described below.

Download FCOI Forms

[Images of FCOI Form I (3 Pages) and FCOI Form II (4 Pages)]

Institutions with a PHS-Compliant FCOI Policy

The following process applies to recipients of Public Health Service (PHS)-funded subawards issued by the University of Pittsburgh who are not members of the FDP FCOI Clearinghouse, but have a PHS-compliant FCOI policy of their own.

Proposal Stage Requirements

1. Complete and submit one FCOI Form I for the institution
   a. Provide all information requested in sections 1 and 2
   b. Complete Section 3.1 and provide the full legal name of institution with PHS-compliant FCOI policy
   c. Do not complete section 3.2 – leave all fields in this section blank
   d. An authorized institutional official must sign page 3

2. Return the completed and signed FCOI Form I to the Office of Research with the subaward proposal documents

By completing section 3.1 of FCOI Form I, the institution legally certifies its COI policy meets the requirements of 42 CFR Part 50, Subpart F and 45 CFR Part 94.

Remember to keep your COI disclosures updated year-round. It’s University policy!
Need assistance? Visit us at www.coi.pitt.edu, email coi@pitt.edu, or call (412) 383-1021.
Institutions without a PHS-Compliant FCOI Policy

The following process applies to recipients of Public Health Service (PHS)-funded subawards issued by the University of Pittsburgh who are not members of the FDP FCOI Clearinghouse and do not have a PHS-compliant FCOI policy of their own.

Under these circumstances, pursuant to federal regulation, the institution must follow the University of Pittsburgh’s COI policy. The University will not process the subaward agreement without all of the required documentation.

Proposal Stage Requirements

1. Complete and submit one FCOI Form I for the institution
   a. Provide all information requested in sections 1 and 2
   b. Do not complete section 3.1 – leave this field blank
   c. Complete Section 3.2 by listing the subrecipient PI and all investigators and/or key personnel at the institution
   d. An authorized institutional official must sign page 4
2. Each investigator listed in section 3.2 of Form I completes an individual FCOI Form II
   a. The investigator must answer all questions and provide required explanations if necessary
   b. The investigator signs and dates page 3 of form
3. Return the FCOI Form I and all FCOI Form IIs collected to the Office of Research with proposal documents

Award Stage Requirements

1. All investigators listed in section 3.2 of Form I must complete University of Pittsburgh FCOI training prior to the start of research
   a. Training is accessible online and valid for four years
2. Investigators must submit a new FCOI Form II each year during the active period of the subaward or within thirty (30) days of discovering or acquiring (e.g., through purchase, marriage, or inheritance) a new Significant Financial Interest (SFI).

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