Does the subrecipient process apply to all sponsors?

No. It applies only to PHS and NSF agencies. The PHS and NSF agencies are

- Agency for Healthcare Research and Quality (AHRQ)
- Agency for Toxic Substances and Disease Registry (ATSDR)
- Centers for Disease Control (CDC)
- Food and Drug Administration (FDA)
- Health Resources and Services Administration (HRSA)
- Indian Health Service (IHS)
- National Institutes of Health (NIH)
- Substance Abuse and Mental Health Services Administration (SAMHSA)
- National Science Foundation (NSF)

It also applies to the Office of Global Affairs (OG), the Office of the Assistant Secretary for Health (OASH), and the Office of the Assistant Secretary for Preparedness and Response (ASPR).

Does the subrecipient process apply just to applications for NEW funding?

No, it applies to all applications with PHS or NSF funding; new, competitive and non-competitive renewals. The applicable agencies are AHRQ, ATSDR, CDC, FDA, HRSA, HIS, NIH, NSF, and SAMHSA.

How and when should I use the Conflict of Interest Subrecipient Questionnaire Form B?

The Subrecipient Questionnaire should be completed EARLY. As soon as the department knows that one of its investigators is going to submit a proposal for PHS- or NSF-funded research that involves subrecipient organizations, a routing form should be initiated for the application with the name of each subrecipient organization entered in the Subaward Section (Section 6.3). If the subrecipient is in fact listed on the FDP COI Clearinghouse, a confirmation will appear on the routing form.

If the routing form states that the subrecipient is not on the FDP Clearinghouse, and you believe this is incorrect, the FDP COI Clearinghouse should be checked to confirm the certification. If the subrecipient is listed on the FDP COI Clearinghouse, mark “Yes” on the routing form and enter comments in the Comment Field.
If the subrecipient organization is not listed on the FDP COI Clearinghouse, then the department must ask the subrecipient to complete and return the Form B. The completed Form B must then be attached to the routing form.

**What should I do if I can’t find the exact name of the subrecipient organization on the FDP COI Clearinghouse, but I can find what I think is the “parent organization?” (For example: Penn State University vs. Hershey Medical Center)**

You should contact the authorized official at the subrecipient organization for clarification. Alternately, you can confirm by sending Form B to the subrecipient organization.

**The subrecipient organization has returned a completed Form B to me, and they indicated they will be following the UI Policy. What do I do next?**

You should send the completed Form B to the Conflict of Interest in Research Office as soon as possible. Email the completed Form B to Martha Hedberg at martha-hedberg@uiowa.edu.

**Who will review the Conflict of Interest Subrecipient Questionnaire Form B?**

Staff in the Division of Sponsored Programs (DSP) and the UI Conflict of Interest in Research (COIR) Office will be responsible for reviewing Form B before approving the application for submission to the PHS and NSF funding agencies.

**Does a researcher at the subrecipient organization need to complete a financial interest disclosure form for UI?**

Yes, if all of the following are true:

- the research is funded by the PHS or NSF,
- the subrecipient researcher is designated by the UI PI as “key personnel”, and
- the subrecipient organization does not have its own conflict of interest policy that complies with the federal regulation (and therefore, the organization must follow UI’s policy)

**How does the subrecipient “key person” do a financial interest disclosure form?**

The UI Conflict of Interest in Research (COIR) Office will send the disclosure form to the contact person listed on Form B. The subrecipient contact person should instruct their investigator to complete the
disclosure form and return it directly to the COIR Office. Also, the COIR Office will send the individual the University’s conflict of interest training module that must be completed, signed and returned to the UI at the same time as the financial interest disclosure form.

If a department is working with the same subrecipient (that is not listed on the FDP COI Clearinghouse) for more than one research project, is it necessary to have the subrecipient complete a Form B for each project?

Yes. The questions are applicable to each PHS or NSF funded project; therefore the Form B must be completed for each proposal. In addition, the UI PI must name the key personnel at the subrecipient organization.

Who will answer questions for subrecipients about the PHS/NSF Financial Conflict of Interest regulations?

The UI Conflict of Interest in Research (COIR) Office will follow up with subrecipients based on answers on Form B, and can also answer questions. Questions may be directed to Martha Hedberg, martha-hedberg@uiowa.edu, 319-384-4256.