Subrecipient FCOI Certification Decision Chart

Are you submitting a proposal to Dept. of Energy or NIH (or another sponsor following PHS FCOI Guidance)?

Yes

Is the Subaward Institution listed on the FDP FCOI Clearinghouse?

Yes

Sub's FCOI Policy can be followed. No Subrecipient FCOI Certification is Needed

No

Subrecipient FCOI Certification is Needed

No

No Subrecipient FCOI Certification is Needed

Does the Subrecipient FCOI Certification include a checkbox in Section A. or Section B.?

Section A.

Likely that Sub's FCOI Policy can be followed. No additional information or documents are needed at this time.

Section B.

Since Investigator is following Brown's FCOI Policy, a completed Non-Brown Investigator FCOI Disclosure Form will be required for individuals listed in Part II of the Subrecipient Certification

*Note that a Non-Brown Investigator FCOI Disclosure Form is required for any FCOI Additional Investigator who is not covered by a subaward. Additionally, a Non-Brown Investigator FCOI Disclosure Form is always required when a Consultant is listed as an FCOI Additional Investigator.

Links to Forms and Resources

1. List of Agencies Using PHS FCOI Regulations
2. Federal Demonstration Partnership Institutional Clearinghouse
3. FCOI Sub-recipient Certification Form Update when new doc is final
4. FCOI Assurance Form For Non-Brown University Investigators

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