



Office of Research Administration  
**Documentation of Conflict of Interest (COI) Policy**  
(For use by Subrecipients not participating in the FDP Expanded or FCOI Clearinghouse)  
[ora.umd.edu](http://ora.umd.edu)

**Project Information**

UMD Principal Investigator

Awarding Agency

UMD Prime Award Number

Prime Award Project Title

Subrecipient Legal Name

Subrecipient Principal Investigator

- **Investigator** means anyone with responsibility for the design, conduct, or reporting of the research.
- **Financial Interest** means anything of value whether or not the value is readily ascertainable.
- **Financial Conflict of Interest (FCOI)** means a significant financial interest that could directly and significantly affect the design, conduct, or reporting of PHS funded research.
- **Significant FCOI** means the value of any remuneration (salary, payment for services, consulting fees, honorarium, paid authorship, stock) exceeding \$5000 in the prior 12 months. **The UMD threshold is \$0.**

Subrecipient COI Policy Statement (choose either **Option 1** or **2** below)

**Option 1** - Subrecipient will follow its own written Conflict of Interest Policy developed in accordance with the Federal Disclosure Requirements of the Awarding Agency and hereby certify that:

No FCOI exists which might in any way bias the proposed research project.

One or more F/COI currently exist(s) which must be reported to the University of Maryland Conflict of Interest Office ([coi@umd.edu](mailto:coi@umd.edu)) within thirty (30) days of signing this document in order for UMD to submit the information to the Prime Sponsor.

**Option 2** - Subrecipient will follow the Policy and Procedures on Financial Conflicts of Interest established and enforced by the University of Maryland (<https://research.umd.edu/resources/research-compliance/conflicts-interest-coi/coi-policies-and-procedures>)

**If Subrecipient chooses Option 1 above, please continue to the Approval section. If Subrecipient chooses Option 2**

**Approval:**

I certify that the information listed on this form is true, complete, and accurate to the best of my knowledge and that I am an Authorized Organizational Official for my institution.

Signature

Date

Printed Name

Title

ALL QUESTIONS REGARDING THE USE OF EITHER COI OR THE CITI-COI TRAINING PROGRAM SHOULD BE DIRECTED TO [COI@umd.edu](mailto:COI@umd.edu).

NOTE: If the Subrecipient does not participate in the FDP Expanded or FCOI Clearinghouse, the proposed Subaward submitted in conjunction with the Prime Award referenced on this form cannot be issued by the University of Maryland until this certification has been returned to the Office of Research Administration and all other requirements completed.

The individuals named below (attach additional pages as needed) have been determined by the Subrecipient Principal Investigator to be responsible for the design, conduct, or reporting of the proposed research:

Subrecipient Lead PI  
 Investigator/Key Personnel  
 Investigator/Key Personnel  
 Investigator/Key Personnel  
 Investigator/Key Personnel  
 Investigator/Key Personnel

Investigators (above) will: 1) disclose all Significant Financial Interests (SFI's) as defined by the University of Maryland's institutional Policy and Procedures on Financial Conflicts of Interest (UMD's zero dollar reporting threshold replaces the \$5K PHS threshold) for review and 2) complete the University of Maryland online FCOI CITI Training.

Second tier Subawardees included in Subrecipient budget must either certify that they have an active and enforced conflict of interest policy that is consistent with the provisions of 42 CFR Part 50, Subpart F "Responsibility of Applicants for Promoting Objectivity in Research" and 45 CFR Part 94 "Responsible Prospective Contractors." Second tier Subawardees that have their own policy must also certify that, to the best of their knowledge, all financial disclosures have been made related to the activities that may be funded by or will have been satisfactorily managed, reduced or eliminated in accordance with their conflict of interest policy prior to the expenditures of any funds under any resultant agreement. If the second tier subawardee does not have a policy, they must complete this form. The first tier Subrecipient organization shall return the second tier Subawardee(s) Certification(s) to UMD along with their own.

**INDIVIDUAL REGISTRATION IN THE UNIVERSITY OF MARYLAND KCOI ONLINE SYSTEM AND SUBMISSION OF SFI'S IS REQUIRED OF ALL INDIVIDUALS NAMED ABOVE.** Registration in the University of Maryland online system can be completed by going to <https://research.umd.edu/coi> and following the information in the <https://research.umd.edu/coi/faq#Subrecipients>.

**COI TRAINING BY SUBRECIPIENT INVESTIGATORS (COI Mini-Course)**

COI online training must be successfully completed by ALL Subrecipient personnel named above via the Collaborative Institutional Training Initiative (CITI) website. CITI registration information can be obtained at <https://research.umd.edu/coi> under Register for COI Training. The new user should select the University of Maryland College Park as the Participating Institution found in the drop-down menu for Step 1 under New Users Register Here.

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