

Prior to submitting a proposal, check FDP Clearinghouse, or your records, for indication that the sub has a PHS-compliant COI policy



If neither applies, send Forms A & B to prospective subrecipient



If sub can certify its compliance with PHS regs, then it will return Form A certifying, and follow its own policy



If sub cannot certify compliance (on Form A), then it must follow PSU policy RA20 and each Investigator at sub must complete Form B and return to ORP prior to submission of proposal



If using its own policy, the sub *only must submit further information to PSU if the sub identifies a FCOI*. Information must be reported to PSU prior to spending on the award



ORP will submit FCOI report(s) to the PHS agency through eRA Commons

If the sub must follow PSU's policy RA20, then ORP will receive Form B and review it for potential FCOI, following PSU's normal procedures



If PSU identifies a FCOI for any of the sub's Investigators, ORP will submit a FCOI report via eRA Commons. This must be completed prior to spending on the subaward.



ORP will maintain ongoing annual disclosures and manage compliance throughout the award.