

**INSTRUCTIONS FOR SUBMITTING FCOI POLICY INTO
eRA Commons IPF MODULE**

Upload a PDF copy of the institution’s financial conflict of interest (FCOI) policy in the IPF Module under the “Policy Documents” tab. The institution’s FCOI policy must be compliant with the regulatory requirements provided in the FCOI regulation at [42 CFR Part 50, Subpart F](#), Promoting Objectivity in Research, applicable to Public Health Service (e.g., NIH) grants and cooperative agreements. The FCOI policy must be posted on a publicly accessible web site as required by the NIH Grants Policy Statement, [Section 4.1.10](#).

NIH encourages institutions to review the Policy Development Checklist posted on the NIH Office of Extramural Research, FCOI, web page at <https://grants.nih.gov/grants/policy/coi/Checklist-for-Policy-Development-For-Posting-4-23-2020.pdf> to determine if the institution’s policy complies with the regulatory requirements. The following table provides a summary of requirements and the regulatory citations for your reference:

REGULATORY REQUIREMENTS	REGULATORY CITATION OR NIH GPS
<input type="checkbox"/> Training requirements	42 CFR 50.604(b)
<input type="checkbox"/> Disclosure, Review, Manage and Monitor Requirements	42 CFR 50.603 42 CFR 50.604(e)(1)-(3) 42 CFR 50.604(f) 42 CFR 50.604 (g) 42 CFR 50.605(a)(1)-(6)
<input type="checkbox"/> Reporting Requirements to NIH	42 CFR 50.604(h) 42 CFR 50.605(b) 42 CFR 50.605(a)(3)(iii) 42 CFR 50.606(a)
<input type="checkbox"/> Enforcement Mechanisms and Remedies and Noncompliance	42 CFR 50.604(j)
<input type="checkbox"/> Retrospective Review Requirements	42 CFR 50.605(a)(3)
<input type="checkbox"/> Subrecipient Requirements	42 CFR 50.604(c) and NIH GPS 15.2.1
<input type="checkbox"/> Public Accessibility Requirements for FCOIs identified for Senior/Key Personnel	42 CFR 50.605(a)(5)(i)-(iv)
<input type="checkbox"/> Maintenance of Records	42 CFR 50.604(i)
<input type="checkbox"/> Clinical Research	42 CFR 50.606(c)

Inquiries

Please direct all inquiries related to this requirement to:

Division of Grants Compliance and Oversight

Office of Policy for Extramural Research Administration, OER
Telephone: 301-435-0938
Email: FCOICompliance@mail.nih.gov

For eRA Commons support contact eRA at <https://grants.nih.gov/support/index.html>