

SPONSORED PROJECTS ADMINISTRATION

SUB-AWARDEE FINANCIAL CONFLICT OF INTEREST POLICY

EXCEPTION REQUEST

This is a request to allow the above subrecipient to be subject to Columbia University’s Policy on Financial Conflicts of Interest and Research, revised effective Aug. 24, 2012, to fulfill the requirements of Public Health Service Regulations entitled *Responsibility of Applicants for Promoting Objectivity in Research for which PHS Funding is Sought*, 42 CFR Part 50 Subpart F (“PHS Regulations”), as amended Aug. 24, 2012. You must complete all of the information below for consideration by the Office of the Executive Vice President for Research. Completed forms should be sent to Sponsored Projects Administration via email at grants-office@columbia.edu (CUMC) or at ms-grants-office@columbia.edu (MS & Lamont).

Project Title: _____

Sponsor: _____

Sponsor Award Number: _____

Columbia PI: _____

Sub PI: _____

Sub Institution: _____

Sub Institution Address: _____

Anticipated Start Date of Project: _____

Anticipated Period of Subawardee Involvement: _____

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1. Description of project, including role of subrecipient.

2. Identity and role of subrecipient investigators who will work on this project. Please note that “investigator” is defined as: the Project Director/Principal Investigator and any other individual, regardless of title or position, who is responsible for the design, conduct, or reporting of research funded by the PHS, or proposed for such funding. This term is not intended to include individuals who are purely advisory or are not sufficiently independent to be in a position to influence design, conduct or results of such Research.

a. Name _____
Role _____

b. Name _____
Role _____

c. Name _____
Role _____

d. Name _____
Role _____

e. Name _____
Role _____

f. Name _____
Role _____

[Please add additional if needed]

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3. Justification for why the proposed subrecipient is uniquely qualified to carry out the proposed scope of work and cannot be replaced by an organization with its own Financial Conflict of Interest policy in compliance with PHS regulations:

4. Subrecipient's plan for developing and implementing an FCOI Policy in compliance with PHS Regulations, including estimated time by which subrecipient will be in compliance: