Tuesday Tips is a new outreach effort by OGCA. The idea behind Tuesday Tips is to convey tips, tricks and other helpful information around the area of research administration. Our goal is to post on (almost every) Tuesdays. If there is something you would like to see covered on Tuesday Tips, email: UAF-GCReATE@alaska.edu. For more Tips visit OGCA website.

Required Submission of Financial Conflict of Interest Policy into the eRA Commons Institution Profile (IPF) Module

Notice Number: NOT-OD-21-002

Release Date: September 30, 2020

Background

NIH policy (see NIH GPS Section 4.1.10 Financial Conflict of Interest)

award of the type 4 R44, U44, R42, and UT2 Phase II SBIR/STTR awards.

Automating FCOI Submission Processes for Recipients

Effective November 12, 2020, NIH funded recipients will be required to submit their publicly assessible FCOI policy to NIH via the eRA Commons Institution Profile (IPF) Module (IPF Module). While the automated requirement goes into effect in November, NIH recognizes that recipients will need to modify their internal systems in order to comply. Therefore, applicants and recipients have until December 1, 2020, to comply with this requirement.

A PDF of the FCOI policy must be submitted by the institutional signing

-specific level, so it is not necessary to submit the FCOI policy with each grant application.

NIH plans to make future enhancements to the IPF Module which, in addition to a PDF of the FCOI policy, will require institutions to: 1) provide the URL of the FCOI policy and 2) complete an annual institutional FCOI certification of compliance with all identified regulatory requirements. As part of the annual certification, institutions will be required to provide an updated URL and a copy of the revised policy if changes have been made since the last submission. NIH will provide reminder notifications to the IPF SO when the annual certification is required.

their institution. The IPF Module allows the institutional SO to electronically maintain external organization profile information necessary for all grant applications for their institution.

Consequences for Noncompliance

2020, may cause NIH to delay the issuance of awards, impose specific award conditions or take other enforcement actions to address compliance. These actions may also be imposed as a result of noncompliance with FCOI requirements.

Resources

Instructions for submitting the FCOI Policy into the IPF Module can be found on _____ and eRA Commons Overview of Institutional Profile (IPF).

Institutions are encouraged to refer to the resources NIH has made available on its Office of Extramural Research (OER), Financial Conflict of Interest
checklist provides an overview of the requirements of the FCOI regulation and serves as a checklist resource for developing, revising or reviewing an pliance with all regulatory

tutorial and Frequently Asked Questions (FAQs) that are also available on the NIH OER FCOI Web site   FAQ G.1 addresses the requirement to ebsite. You can find information on the public accessibility requirements, including the requirement to post your FCOI policy, in Section G., Public Accessibility, of the FAQs.