Documentation of Subrecipient Financial Conflict of Interest (FCOI) Policy

Dear Potential Subrecipient:

You are receiving this letter and the attached form because you are a proposed subrecipient on a proposal that the University of North Carolina at Asheville (UNC Asheville) intends to submit for funding. N.C.G.S. § 143C-6-23 require us to collect certain information from you at the time of proposal and during the life of the award.

Please complete the attached form and include it with the subrecipient commitment form for review by the UNC Asheville Office of Sponsored Programs.

Thank you in advance for your cooperation. If you have any questions, we encourage you to contact your organization’s business office or office of sponsored programs. They may be able to assist you in making determinations concerning your organization’s policies.

Resources:

Information regarding the N.C.G.S. may be found at http://www.ncleg.net/gascripts/statutes/statutelookup.pl?statute=143C.

If you have any questions concerning this form or the sub-recipient process at UNC-Asheville, please contact lttoms@unca.edu.
UNC ASHEVILLE – OFFICE OF SPONORED PROGRAMS

SUB-RECIPIENT FCOI POLICY CERTIFICATION

1. Sub-recipient Legal Name:

2. Sub-recipient Address (Complete):

3. Sub-recipient DUNS#: ___________________________ EIN#: ___________________________

4. Prime Sponsor:

5. Proposal/Project Title:

6. Sub-award Period of Performance:

Please check one of the following:

☐ A. The Subrecipient has implemented and is enforcing a written policy of financial conflict of interest compliant with N.C.G.S. § 143C-6-23. I certify that all subrecipient investigators (individuals responsible for the design, conduct, or reporting of research for the proposal) have made the required disclosures to the sub-recipient’s institutional official in accordance with the Subrecipient’s policy

☐ B. The sub-recipient has not implemented a written policy for financial conflict of interest compliant with N.C.G.S. § 143C-6-23. I certify that the Subrecipient will perform the following steps:

1). establish a conflict of interest policy in compliance with N.C.G.S. § 143C-6-23, including the implementation of a disclosure requirement for all Subrecipient investigators, in advance of the receipt of the award. This disclosure requirement will mandate the submission of updated disclosures for sub-recipient investigators within 30 days of discovery or acquiring (e.g., through purchase, marriage, or inheritance) a new significant financial interest (including significant financial interest that arise between the time the proposal is submitted and an award is made), within 30 days of occurrence of reimbursed or sponsored travel as specified in the policy, and at least annually during the period of the award.

2). establish a process to collect, review and manage sub-recipient Investigator disclosures that are related to the research being conducted under the sub-award, and report financial conflict of interest (FCOI) to UNC Asheville’s Office of Sponsored Programs (251-6476) sufficiently in advance of the award receipt date for UNC Asheville to submit FCOI agency reports as required.

If I require assistance or clarification for any of the above, I will contact the Office of Sponsored Programs at itoms@unca.edu.

I certify that the information listed above is true, complete and accurate to the best of my knowledge, and that I am an Authorized Organizational Official for my institution. The appropriate programmatic and administrative personnel involved in this disclosure are award of agency policy in regard to sub-awards and are prepared to establish the necessary inter-institutional agreements and/or FCOI management plans consistent with these policies.

Signature ___________________________ Date ___________________________

Printed Name ___________________________ Title ___________________________

Email ___________________________