



Form 2 Information Sheet: Institutional Declaration Form for Subrecipients/External Investigators

Purpose: The following instructions are to assist with the completion of the Institutional Declaration (Form 2).

If you are either a proposed Subrecipient or unfunded External (non-UBC) Investigator on a grant proposal that the University of British Columbia (UBC) intends to submit for funding to a funding agency that requires compliance with the US PHS FCOI Regulations, please have your authorized institutional official complete this form and return it to the UBC grant administrator involved, with a copy to US.FCOI@ubc.ca.

Context: The US PHS FCOI Regulations (42 C.F.R. Part 50 and 45 C.F.R. Part 94) establish requirements to ensure that research funded by the US PHS is free from bias resulting from financial conflicts of interest (FCOI). Pursuant to these requirements, institutions must collect certain information from Investigators at the time of proposal, and during the life of the award. This form documents whether non-UBC Investigators are following their own institution's FCOI policy or UBC's, and thereby determines which institution collects the FCOI information from the Investigator.

Instructions

Step 1

Required for all proposals

Have your authorized institutional official complete, sign and return Form 2 to both your UBC grant administrator AND US.FCOI@ubc.ca. This form must be on file **before** UBC can submit a proposal that lists you as an external Investigator or which contains your proposed subaward **unless your institution is listed on the [FDP Clearinghouse](#) as having a PHS-compliant FCOI policy.**

Please ensure that all participating Investigators at your institution are listed in Part 1 of the Declaration Form. For ease of reference, "Investigator" is defined in the Regulations as: **"the project director or principal investigator AND any other person, 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, which may include, for example, collaborators or consultants."**

Step 2

Required where subrecipient Investigators are following UBC's FCOI policy

Where UBC's FCOI policy is being followed, each subrecipient/external Investigator must complete, sign and return a SFI Disclosure Form (Form 3) to US.FCOI@ubc.ca. All SFI Disclosure Forms must be on file before UBC can submit a proposal containing your proposed participation or subaward component.

If this proposal is awarded, no PHS funds may be released on the subaward until US PHS FCOI requirements have been met. Additional information regarding the Regulations may be found at:

<http://grants.nih.gov/grants/policy/coi>.

For more information regarding UBC FCOI compliance, please see the information on the website (<https://ethics.research.ubc.ca/financial-conflict-interest>) or contact the UBC Office of Research Ethics at US.FCOI@ubc.ca.