

UNIVERSITY OF MARYLAND BALTIMORE COUNTY
OFFICE OF SPONSORED PROGRAMS
FINANCIAL CONFLICT OF INTEREST ADDENDUM FOR SUBRECIPIENTS UNDER PHS FUNDED
RESEARCH

UMBC PI:	
FUNDING AGENCY:	
PROJECT TITLE:	
SUBRECIPIENT ORGANIZATION:	
EIN:	
SUBRECIPIENT PI:	
PROJECT PERIOD:	
SUBRECIPIENT KEY PERSONNEL* (All Subrecipient's investigators who are named on the Prime Grant application)	1) 2) 3) 4) 5)

Under 42 C.F.R. 50(F), institutions carrying out PHS-funded research must maintain a written policy on financial conflict of interest. In addition, if an institution carries out such research with collaborators or subcontractors, it must take reasonable steps to ensure that investigators employed by those entities are in compliance with federal regulations, either by requiring those investigators to comply with the institutional policy or by requiring collaborators to provide assurances to the institution that will enable it to comply with the regulation.

A financial conflict of interest exists when an investigator, his/her spouse, or dependent children have a significant financial interest that would reasonably appear to be affected by the research for which PHS funding is sought, and in entities whose financial interests would reasonably appear to be affected by the research.

A significant financial interest means anything of monetary value, including but not limited to, salary or other payments for services (e.g., consulting fees or honoraria); equity interests (e.g., stocks, stock options or other ownership interests); and intellectual property rights (e.g., patents, copyrights and royalties).

1. Does the Subrecipient maintain an appropriate, written, enforced policy on conflict of interest pursuant to 42 C.F.R. 50.604(a)? ☐ Yes ☐ No

If "Yes", please move to Question #2.

If "No", please move to Question #3.

2. Subrecipient certifies that the following statement is true regarding all of the Key Personnel named above, as well as for their spouses, and dependent children, if applicable. (Please check one)

- ☐ None of the Key Personnel, their spouses, or their dependent children have a significant financial interest (e.g., royalty, equity, ownership interest, consulting fees, or other income, or entitlement to royalty, equity, consulting fees, or other income) in the performance of the statement of work under this Subaward Agreement.
- ☐ One or more of the Key Personnel, their spouses, or their dependent children have a financial interest (e.g., royalty, equity, ownership interest, consulting fees, or other income, or entitlement to royalty, equity, consulting fees, or other income) in the performance of the statement of work under this Subaward Agreement.
List of conflicted investigator(s): _____

If this statement is true, Subrecipient agrees to provide supporting documentation to UMBC identifying any conflict and describing how it has been managed, reduced, or eliminated.

3. Subrecipient acknowledges that it does not maintain a policy on conflict of interest pursuant to 42 C.F.R. 50.604(a). As such, Subrecipient certifies that it will adhere to the definitions of “financial conflict of interest” and “significant financial interest” provided above, that it will abide by the UMBC Conflict of Interest policy available at http://www.umbc.edu/research/ORPC/coi_policies_umbc.html, that it will complete all necessary training as put forth at http://www.umbc.edu/research/ORPC/Col_training.html, and report to UMBC any identified financial conflict of interest and subsequently work with UMBC to ensure that the conflict is managed, reduced, or eliminated.

Subrecipient certifies that the following statement is true regarding all of the Key Personnel named above, as well as for their spouses and dependent children, if applicable. (Please check one)

- ☐ None of the Key Personnel, their spouses, or their dependent children have a significant financial interest (e.g., royalty, equity, ownership interest, consulting fees, or other income, or entitlement to royalty, equity, consulting fees, or other income) in the performance of the statement of work under this Subaward Agreement.
- ☐ One or more of the Key Personnel, their spouses, or their dependent children have a financial interest (e.g., royalty, equity, ownership interest, consulting fees, or other income, or entitlement to royalty, equity, consulting fees, or other income) in the performance of the statement of work under this Subaward Agreement.

List of conflicted investigator(s): _____

If this statement is true, Subrecipient agrees to provide supporting documentation to UMBC identifying any conflict. Subrecipient warrants that it will comply with any requests from UMBC for additional information and that it will take any steps identified by UMBC as necessary in order to manage, reduce, or eliminate such conflict.

Subrecipient certifies that the statements on this document are true, as evidenced by the following signatures:

Authorized Official of Subrecipient

Date

Typed Name and Title