

KC COI Tip #3: Form 800SR or 900SR Only Required if Subrecipient is Complying with UCI's COI Policy

Please remember that many universities already have their own PHS/NSF Conflict of Interest policies. This should be verified on the **Subrecipient Commitment Form** that the subrecipient provided.

Verify on the Subrecipient Commitment Form:
Form 800SR (PHS) or Form 900SR (NSF) should only be collected if subrecipient states that it does **not** have its own COI policy and will abide by UCI's policy.

8. **Financial Conflict of Interest – National Science Foundation (NSF)**
Applicable to projects funded by NSF, including NSF flow-through or any sponsor following NSF's COI Policy.
- Not applicable because this project is not being funded by NSF or any other sponsor following NSF's COI Policy.
 - Subrecipient organization/institution hereby certifies that it has an active and enforced policy on conflict of interest consistent with the provision of NSF Award & Administration Guide Chapter IV.A.
 - Subrecipient does not have an active and/or enforced conflict of interest policy and hereby agrees to abide by UCI's policy. To comply with UCI's policy, please attach a completed [Form 900](#) for each investigator on this project.
9. **Financial Conflict of Interest – Public Health Service (PHS)**
Applicable to projects funded by PHS/NIH, or any [sponsor following PHS](#).
- Not applicable because this project is not being funded by PHS/NIH or any other sponsor following the PHS FCOI Regulations.
 - Subrecipient organization/institution hereby certifies that it has an active and enforced policy on conflict of interest consistent with the provision of 42 CFR Part 50 Subpart F.
 - Subrecipient does not have an active and/or enforced conflict of interest policy and hereby agrees to abide by UCI's policy. To comply with UCI's policy, please attach a completed [Form 800SR](#) for each investigator on this project.

Conflict of Interest (Incomplete) hide

hide Questions print

Is the sponsor or prime sponsor a non-governmental entity that is not on the exempt sponsor list?
 Yes No

Are there any subrecipients complying with UCI's PHS or NSF conflict of interest policies? If yes, please attach financial disclosures for all subrecipient Investigators. Subrecipient Investigators on PHS compliant 800SR. Subrecipient Investigators on NSF compliant projects must complete the Form 900SR.
 Yes No

For projects sponsored by PHS or NSF or an organization adopting PHS or NSF policies, are there any non-UCI Investigators on this project? If yes, please attach financial disclosures for all non-UCI Investigators. Non-UCI Investigators on NSF compliant projects must complete the Form 800SR. Non-UCI Investigators on NSF compliant projects must complete the Form 900SR.
 Yes No

If the subrecipient does not have its own policy, then you should check "yes" in response to the relevant COI Question in the Proposal Development document and follow instructions to collect completed Form(s) 800SR (PHS) or 900SR (NSF) from the subrecipient Investigator(s) complying with UCI's COI policy.

KC COI Tip #4: Form 800SR or 900SR Required for Non-UCI Investigator (But Who is a Non-UCI Investigator?)

If there are any Non-UCI Investigators (that are not Subrecipient Investigators) participating in the UCI portion of the project, they are also required to submit the Form 800SR (PHS) or 900SR (NSF). You should check "yes" in response to the relevant COI Question in the Proposal Development document.

A final determination should be made by the Principal Investigator. If you are unsure, please contact the COI Team.

Conflict of Interest (Incomplete) hide

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Is the sponsor or prime sponsor a non-governmental entity that is not on the exempt sponsor list? More Information...
 Yes No

Are there any subrecipients complying with UCI's PHS or NSF conflict of interest policies? If yes, please attach financial disclosures for all subrecipient Investigators. Subrecipient Investigators on PHS compliant projects must complete the Form 800SR. Subrecipient Investigators on NSF compliant projects must complete the Form 900SR. More Information...
 Yes No

For projects sponsored by PHS or NSF or an organization adopting PHS or NSF policies, are there any non-UCI Investigators on this project? If yes, please attach financial disclosures for all non-UCI Investigators. Non-UCI Investigators on PHS compliant projects must complete the Form 800SR. Non-UCI Investigators on NSF compliant projects must complete the Form 900SR. More Information...
 Yes No