

Subrecipient Interest Disclosure Form

What is this form for? Subrecipient entities that do not have a conflict of interest (COI) policy compliant with federal financial disclosure requirements and have elected to rely on VCU's COI policy should use this form. Each individual designated as a 'COI Investigator' must disclose their interests (and those of their immediate family) related to the proposed work. This form must be completed prior to proposal submission. In the event the project is selected for funding, subsequent disclosure via VCU's Activity and Interest Reporting System (AIRS) will be required prior to subaward issuance.

Who is considered a COI Investigator and is therefore required to disclose? The COI Investigator designation is determined jointly by the VCU PI and the Subrecipient PI. Any individual responsible for the design, conduct, or reporting of research should be considered a COI Investigator. An individual's role in the project, rather than their title, and the degree of independence with which those individuals work should be primary considerations. Anyone under direct supervision and with limited/no decision-making authority, personnel who support the research enterprise, and/or engaged community members recruiting or surveying participants are likely *not* COI Investigators. By default, the Subrecipient PI is designated as a COI Investigator unless the dashed box below is selected and VCU's COI in Research Program concurs.

I. Project Information

Subrecipient Entity Name	<input type="text"/>	Subrecipient DUNS	<input type="text"/>
Subrecipient PI	<input type="text"/>	VCU PI	<input type="text"/>
Subrecipient Project Title	<input type="text"/>	VCU Proposal #	<input type="text"/>

II. Designation of COI Investigators

The Subrecipient PI is a COI Investigator.

The Subrecipient PI completes and signs Section III and sends both pages of this form directly to the VCU COI in Research Program at AIRS@vcu.edu with a copy to the VCU's Division of Sponsored Programs (DSP) at dirospa@vcu.edu.

The following personnel also meet the definition of COI Investigator.

Each person listed below must separately complete Section III send both pages of this form directly to the VCU COI in Research Program at AIRS@vcu.edu with a copy to the VCU's Division of Sponsored Programs (DSP) contact at dirospa@vcu.edu

COI Investigator Name

COI Investigator Name

No project personnel, including the Subrecipient PI, meet the definition of a COI Investigator.

DO NOT FILL OUT SECTION III. Sign and send only this page (Sections I and II) to VCU's COI in Research Program at AIRS@vcu.edu (include 'Urgent Subrecipient Review' in the subject line).

Signature of Subrecipient PI

Date

(N/A if digitally signed with embedded date)

Signed concurrence of COI Committee Chair or designee

Date

(Signature required ONLY if the box in this dotted section is checked. To be forwarded to DSP.)

III. Subrecipient COI Investigator Interest Disclosure

VCU Proposal #	<input type="text"/>		
COI Investigator Name	<input type="text"/>	Email Address	<input type="text"/>
Subrecipient Entity Name	<input type="text"/>	Subrecipient PI	<input type="text"/>

Answer the following questions about your interests (and those of your spouse/dependents in the same household) in the context of the proposed work. In the event the project is selected for funding, the Subrecipient's COI investigator(s) will receive a VCU affiliation eID and must submit a detailed interest report via VCU's Activity and Interest Reporting System.

- Officer, Director, and Advisory Board Positions**
In the past 12 months, have you or a member of your immediate family served as a paid or unpaid officer, director, or advisory board member: Yes No
- Stocks, Stock Options, and Bonds**
In the past 12 months, have you or a member of your immediate family-owned stocks, stock options, or corporate bonds that you directly control: Yes No
- Outside Professional Activities and/or Travel**
In the past 12 months, have you or a member of your immediate family received remuneration outside of your place of work for consulting or other outside professional activities (including international), or related travel: Yes No
- Non-institutional Salary or Other Income**
In the past 12 months, have you or a member of your immediate family received a salary or other income that was not part of your employment: Yes No
- Business Ownership**
In the past 12 months, have you or a member of your immediate family owned or operated a business (either foreign or domestic): Yes No
- Intellectual Property**
Have you or a member of your immediate family disclosed any intellectual property to an entity (*another university or a company*) (enter all intellectual property including copyrights, regardless of patent or license status): Yes No

Signature of COI Investigator

Date

(N/A if digitally signed with embedded date)

Send completed, signed forms from all COI Investigators to VCU's COI in Research Program at AIRS@vcu.edu with a copy to the VCU's Division of Sponsored Programs (DSP) contact (include 'Subrecipient Interest Disclosure Form' in the subject line).