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June 2012 COGR Meeting Thursday Morning FCOI Presentation - Blum

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Published Date: 06/13/2012

FCOI Questions

- **At time of Application** ... insure **investigators** including subrecipients **disclose SFI**
 - If subrecipient policy, disclose to sub; sub reports FCOI to prime; prime reports to NIH **prior to expenditures of funds**
 - If prime policy, sub-investigators report SFI to prime; prime reports FCOI to NIH
- Hinges on **written agreement** delineating prevailing policy & **sub certify** that sub-policy compliant

- If sub doesn't have a policy at time of application – investigators must disclose to prime - BUT develops a policy prior to award, sub's NEW policy can prevail through the life of the award.
- If foreign sub without policy, investigators disclose to prime and prime policy prevails

- Preaward costs: [From FAQ] Can incur preaward costs BUT submit FCOI report to NIH prior to expenditure of funds authorized under award, ***“that is after the NOA is issued and before the specific amount is charged to NIH award.”***
 - What does that mean to you?