

OSR Decision Matrix Relative to Subrecipient COI Compliance at Proposal Submission

PROPOSAL STAGE				
	COI language in LOI (LOI)	Subrecipient Commitment Form (SCF)	OSR Action?	NUCOI Involvement?
Subrecipient institutions is listed in FDP Clearinghouse	<i>Not required</i>	<i>Not required</i>	<i>None required</i>	<i>None required</i>
Subrecipient institution is US institution of higher education or an academic medical center and <u>NOT</u> listed in FDP Clearinghouse	✓	✓	<ul style="list-style-type: none"> If institution certifies to a compliant COI policy, OSR can proceed – the institution is abiding by their own policy <ul style="list-style-type: none"> ✓ OSR may request NUCOI verification of compliant policy if there are questions/concerns If institution notes in SCF that institution will abide by NU policy, research/department administrator proceeds with subrecipient COI training and disclosure paper process, which OSR verifies is complete prior to proposal submission¹ 	
	<i>LOI <u>or</u> SCF required</i>			
Subrecipient is for-profit or non-profit institution <u>NOT</u> listed in FDP Clearinghouse	✓	✓	<ul style="list-style-type: none"> If institution certifies to a compliant COI policy, OSR should request NUCOI verification of compliant policy <ul style="list-style-type: none"> ✓ With NUCOI verification of a compliant policy, OSR can proceed If institution notes in SCF that institution will abide by NU policy, research/department administrator proceeds with subrecipient COI training and disclosure paper process, which OSR verifies is complete prior to proposal submission¹ 	
	<i>LOI <u>or</u> SCF required</i>			
Subrecipient is foreign institution		✓	<ul style="list-style-type: none"> If institution certifies to a compliant COI policy, OSR should request NUCOI verification of compliant policy <ul style="list-style-type: none"> ✓ With NUCOI verification of a compliant policy, OSR can proceed If institution notes in SCF that institution will abide by NU policy, research/department administrator proceeds with subrecipient COI training and disclosure paper process, which OSR verifies is complete prior to proposal submission¹ 	

¹<http://www.northwestern.edu/coi/subrecipients/index.html>