

## INVITATION TO JOIN FDP CLEARINGHOUSE - PHS FCOI COMPLIANT INSTITUTIONS

The Federal Demonstration Partnership (FDP) is delighted to announce the availability of a Clearinghouse of institutions and entities that have attested that they are or will be compliant with the updated Public Health Service Financial Conflict of Interest regulations (PHS FCOI) as of August 24, 2012. The purpose of this list is to allow institutions to quickly verify that their subrecipients will be compliant with the updated PHS FCOI policy requirements -- thereby avoiding the need for all of us to send forms to each other to document compliance.

### **Adding your Institution to the Clearinghouse**

Although this list is hosted by FDP, it is not limited to FDP member institutions. We invite authorized organizational representatives of non-member FDP institutions and other entities to now enroll their institution at [http://sites.nationalacademies.org/PGA/fdp/PGA\\_070596](http://sites.nationalacademies.org/PGA/fdp/PGA_070596). Note that it is not necessary for you to be compliant with the updated PHS rules today in order to add your institution to the list. Your enrollment certifies that you will be compliant with the updated rules by August 24, 2012. The process is simple and takes less than two minutes.

You will need to have:

- Your preferred institutional name (it is acceptable to include both the name and the acronym if you wish)
- Your primary DUNS number (optional, but recommended)
- The name, title, and email of an Authorized Institutional Official who is providing the certification for their institution

Once you enter the information for your institution, the authorized institutional official will receive an email with an embedded verification link. After clicking on that link, your institution is immediately added to the publicly available list.

If you support a multi-campus university, we recommend that you separately enroll each compliant campus. This will help users who are searching on the specific campus name to quickly verify the presence of that campus.

### **Using the Clearinghouse**

To determine whether an institution is on the list, go to [http://sites.nationalacademies.org/PGA/fdp/PGA\\_070596](http://sites.nationalacademies.org/PGA/fdp/PGA_070596) and select the option for "List of Compliant Institutions and Entities." Scroll down the list to check the status of your proposed subrecipient, or search on full or partial name of your subrecipient or its DUNS number. The name and contact information for the institution's authorized organizational official is included. Institutions on this list have attested, via an authorized organizational representative, that they are (or will be) compliant with the new regulations by August 24, 2012 and are assuming the responsibility for maintaining a compliant program; therefore, it should not be necessary to seek further documentation from them about their FCOI program. Note, however, that the inclusion of an institution on the list in no way impacts the expectation that subrecipients will promptly notify their prime recipient in the event of a determination of a positive conflict of interest. The obligation for a subrecipient to report positive conflicts of interest to their primes, and for the prime to report such conflicts to PHS remains intact.

### **What if an Institution is Not Listed?**

If an institution is not listed, it may still have a compliant policy but has not yet added itself to the list. Please feel free to share these instructions with that entity so that they may join. Only an authorized institutional official from the designated institution or entity can add their institution to the list. The other possibility is that institution does not have an enforced, PHS-compliant FCOI policy. In that event, the institution/entity needs to work with their prime award recipient to determine if it is possible to use the prime's FCOI policy. Entities/institutions without their own compliant policies are NOT included on this list.