



**Entrepreneurial
Training & Consulting**

Institutions must now submit FCOI policy electronically in eRA Commons.

Starting November 12, 2020, the National Institutes of Health will require institutions receiving NIH grants to maintain an up-to-date, written and enforced policy to identify and manage Investigator Financial Conflicts of Interest (FCOI) and to post the policy on their publicly accessible website.

NIH recipients will be required to submit their FCOI policy to NIH **via the eRA Commons Institution Profile (IPF) Module.**

This new feature will apply to all NIH applicants and/or recipients, with the exception of Phase I Small Business Innovative Research (SBIR) or Small Business Technology Transfer (STTR) applicants and/or recipients. (See NIH GPS [Section 4.1.10 Financial Conflict of Interest](#) for more information).

A PDF of the FCOI policy must be uploaded to the IPF by the institutional signing official (SO) under a new tab labeled “Policy Documents.” (The information is provided on an institutional level as part of an institution’s IPF, rather than on a grant-specific level, so it is not necessary to submit the FCOI policy with each grant application.)

The requirement goes into effect on November 12, but NIH recognizes that recipients will need time to modify internal systems.

Applicants and recipients will have until December 1, 2020 to comply with this requirement.

Note that noncompliance with this requirement may cause NIH to delay issuance of awards, impose specific award conditions or take other enforcement actions.

NIH will review all submitted FCOI policies to ensure compliance.

Learn more at nexus.od.nih.gov/all/2020/10/23/institutions-to-submit-fcoi-policy-electronically-in-era-commons-effective-november-12-2020/

