



## Financial Conflict of Interest (FCOI) policy for NIH SBIR/STTR Phase II awardees.

The National Institutes of Health requires 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.

*This feature applies 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.*

NIH Phase II recipients are required to submit their FCOI policy to NIH via the eRA Commons Institution Profile (IPF) Module. (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 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.) NIH will review all submitted FCOI policies to ensure compliance. See the NIH notice [NOT-OD-22-210](#).

**Note:** During the Just in Time process for SBIR/STTR Phase II awards, you may be asked to supply the Company’s FCOI policy if the company has not previously uploaded this policy to the eRA Commons and on the company’s website. Noncompliance with this requirement may cause NIH to delay issuance of awards, impose specific award conditions or take other enforcement actions.

Contact [BCCetc](#) for further guidance regarding this policy and other post-award management assistance.