



Attachment 3 SUB-RECIPIENT FINANCIAL CONFLICT OF INTERESTS AGREEMENT

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PROJECT TITLE _____

FUNDING AGENCY _____

OSR PI / PROJECT COORDINATOR _____

SUB-RECIPIENT INSTITUTION _____

SUB-PI (name and email address) _____

Should the application named above be funded, the writing Institution will participate in this project as a sub-recipient of Ospedale San Raffaele (hereinafter OSR).

In accordance with the Financial Conflict of Interests Regulation issued by the US Department of Health and Human Services (42 C.F.R. Part 50, Subpart F and 45 C.F.R. Part 94, as revised on August 2011), OSR requires disclosure of financial conflicts of interests by its PHS-funded sub-recipients.

The writing Institution Legal Representative's signature below serves as a confirmation that the writing Institution:

has a financial conflict of interests policy and process which conforms to the requirements of the above-mentioned regulation. In case a Financial Conflict of Interest (FCOI) is identified, the writing Institution is required to send to OSR FCOI Official (fcoi@hsr.it) a notification of the conflict and a detailed plan to manage, reduce or eliminate it for the whole duration of the project. The deadlines for the submission are specified below:

Report	Deadline
Initial FCOI report and management plan	Prior to the expenditure of any funds at in any case at least 20 working days before the transfer of funds by OSR
Annual FCOI report and management plan	At least 20 working days before the deadline for the submission of the annual progress report
Revised FCOI report and management plan	Within 40 days of any subsequently identified FCOI
Retrospective review	Within 100 days of the determination of non-compliance
Mitigation report	Promptly when bias is found as a result of a retrospective review

OR

accepts to comply, for the whole duration of the project, with OSR conflict of interest procedure which has been published on OSR institutional website and is publicly available. The writing Institution agrees to submit the list of all Investigators and their Financial Interests Disclosure Forms to OSR FCOI Official (fcoi@hsr.it) according to the deadlines specified in the procedure and to comply with any conditions or restrictions imposed by OSR to manage any real or perceived conflict. The writing Institution understands that the information provided may be disclosed outside of the European Community as required by the Ospedale San Raffaele Financial Conflict of Interests Procedure.

Please check Option A or Option B above. If neither option is applicable, the writing Institution will not qualify to be a Sub-recipient for this project.



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This confirmation is required prior to the submission of the project.

The present agreement is part of the contract between OSR and the writing Institution.

Should additional information be required, please contact OSR FCOI Official via email at fcoi@hsr.it.

Date _____

Signature _____