

Carnegie Mellon University
Subcontractor Guidelines
Compliance with Conflict of Interest Regulations and Policy

**REQUIREMENTS FOR SUBCONTRACTORS AND CONSULTANTS
(PUBLIC HEALTH SERVICES AWARDS ONLY)**

For PHS funded awards, subcontractor personnel and individual consultants are also considered to be Investigators and are subject to disclosure and training requirements. Before the funding proposal is submitted to the sponsor, the individual or institution must confirm that they are registered with the Federal Demonstration Partnership's [FCOI Institutional Clearinghouse](#), have their own conflict of interest policy compliant with Public Health Service FCOI regulations, or agree to abide by [CMU's FCOI policy](#) and the [CMU COI Guidelines](#).

If the subcontracting institution or consultant chooses to be subject to CMU's policy, they will be provided with a disclosure form to complete and return by email before the funding proposal is submitted. The types and dollar amounts of required disclosures will be the same as those required for CMU Investigators seeking PHS funding, laid out in the Guidelines linked above.

These Investigators must also complete training before spending begins on any resulting award, and at least every four years during the award. Investigators may complete the NIH's online training (ADD LINK), or CMU will consider on a case by case basis whether training already completed at another institution is sufficient.

**REQUIREMENTS FOR SUBCONTRACTORS AND CONSULTANTS
(OTHER SPONSORS)**

For all other awards, disclosure and training requirements depend on the contract or agreement terms and the policies of the sponsor. If these terms require additional disclosures or training beyond the standard processes outlined in the CMU COI Guidelines, the Office of Research Integrity and Compliance will notify the individual researchers involved.