

Effective September 1, 2019, non NIH-funded U-M PIs who are conducting research with an NIH-funded lead site or collaborator, will have to apply to the NIH for a CoC to cover their part in the project if they are collecting or maintaining "identifiable, sensitive" data/biospecimens. [Click here for more information.](#)

The non NIH-funded U-M researcher does not benefit by the CoC that is held by the NIH-funded lead site or collaborator (i.e., U-M will not sign the CoC Assurances from the funded researcher/institution).

And, where a U-M researcher is NIH-funded, non NIH-funded collaborators will not benefit from the U-M CoC (i.e., U-M will not accept signed CoC Assurances from the unfunded institution). Non NIH-funded researchers must apply to the NIH to obtain their own CoC.

"NIH-funded" describes a researcher that receives NIH funding via a direct award, sub-award, or sub-contract (where the contract is paid with NIH monies). Direct awards, sub-awards, and sub-contracts must appear in the Proposal Management system and the researcher's eresearch application.

For questions, please contact Mary Ramirez at mramirez@umich.edu or call 615-9464.