

For any identified FCOI, the COI Office staff will work with the Investigator to create a management plan. Upon final approval of the management plan, the COI Office will report the FCOI and management plan to the sponsor. In order to ensure proper award management, the COI Office will inform OSPA of any potential impact on the project.

The COI Office will notify the SGCA, Post-award Team, and DRA by email that all MU Investigators have completed Conflict of Interest Training and either (1) there is no FCOI related to the project or (2) an FCOI management plan has been developed and reported to the sponsor. The COI Office will review FCOIs submitted to MU by any subrecipient on a project and will submit their reports to the sponsor at award and annually, as specified in the regulation.

Note: OSPA will utilize the [FDP Subaward Agreement Forms](#), which include language relevant to the FCOI regulation. Additional language will be added as needed on a case-by-case basis.

The COI Office will submit all required FCOI reports to the sponsor, including annual updates required for previously-reported FCOIs.

OSPA - The SGCA maintains documentation of the COI Office/COIC approval in the OSPA file. The award can be set up upon receipt of the approval notification.

Responsibilities

Below is an outline of responsibilities as they relate to this process at award.

Principal Investigator:

- Collaborate with the COI Office and COIC to expedite approval.
- Work with MU Investigators to ensure all complete Conflict of Interest Training.

Office of Sponsored Programs Administration:

- Notify COI Office via [eCompliance](#) upon notice of new or additional funding, attaching the project's Scope of Work and, if applicable, including subrecipient information.
- Maintain COI Office/COIC approval documentation in the OSPA file.
- Hold award setup until notification of COI Office/COIC approval.

COI Office:

- Initiate COI review process upon notification of impending award.
- Facilitate management plan development when necessary.
- Ensure that all MU Investigators complete Conflict of Interest Training.
- Notify OSPA of COI Office/COIC approval.
- Submit all required FCOI reports (including those of subrecipients) to the sponsor.

SECTION III. DURING THE PROJECT

Procedure

Investigators – MU Investigators must report any sponsored travel² to the COI Office via [eCompliance](#) within 30 days of the trip and must report any new or changed outside interests by submitting an OIDF via [eCompliance](#) within 30 days of acquisition/discovery. Subrecipient external (non-MU) Investigators must meet the same requirements by reporting to the MU COI Office as directed by the subaward agreement.

DRA/OSPA – The DRA and OSPA work closely together for compliant and consistent post-award administration.

Change in Investigators

Note: Before the PI adds a new MU Investigator to an ongoing project, the new MU Investigator must file an Outside Interest Disclosure Form (OIDF) and complete Conflict of Interest Training and the COI Office must complete a COI review.

PI – The PI completes a revised Investigator Form (IF).

DRA – The DRA works with the PI to complete the revised IF. The DRA ensures that all MU Investigators, as defined by the regulation, have submitted an Outside Interest Disclosure Form (OIDF) via [eCompliance](#) in the previous 12 months and that external (non-MU) Investigators have provided the appropriate disclosures or certifications (see Section I above). The DRA submits the revised IF to OSPA.

OSPA – The SGCA or Post-Award Team notifies the COI Office by email at coi@missouri.edu upon receiving notification of a change in investigator(s), whether by way of a revised IF, a request to submit an Investigator Change Request to a sponsor, or as described in the RPPR (see “Non-Competing Continuation Progress Report” below). If a revised IF is received from the PI/DRA, OSPA will submit the documentation in the notification email; otherwise, the COI Office will work with the PI/DRA directly, as described below, to determine the need for a revised IF.

COI Office – The COI Office works with the PI/DRA to determine appropriate changes to the IF on file for the project. The COI Office sends a “Review/Update IF & SOW” notification by email and works with the PI/DRA as needed to complete the process. The COI Office notifies OSPA of any updates submitted.

The COI Office ensures that all new Investigators have met the relevant disclosure and training requirements. The COI Office sends the approval notification to the PI, DRA, SGCA, and Post-award Team. The COI Office facilitates development of a management plan for identified FCOIs and submits to the sponsor an FCOI report within 60 days of determining that a new or newly discovered FCOI exists.

²*Sponsored travel* includes all travel sponsored or reimbursed by any entity other than MU, with the following exceptions for which reporting is not required: a federal, state, or local government agency; an institution of higher education; an academic teaching hospital; a medical center; or a research institute that is affiliated with an institution of higher education.

Non-Competing Continuation Progress Report (non-SNAP and SNAP/RPPR)

DRA – The DRA should immediately notify the COI Office by email when working on a continuation application (e.g., eSNAP/RPPR for NIH-funded projects). Early notification will allow the COI Office to concurrently submit any necessary FCOI reports to the sponsor.

OSPA – The SGCA or Post-award Team should notify the COI Office when working on a continuation application or annual financial and/or technical report. Early notification will allow the COI Office to concurrently submit any necessary FCOI reports to the sponsor.

The SGCA enters an Award Notification via [eCompliance](#) (Projects tab) upon submission of the continuation application.

Note: COI review and subsequent COI Office approval are *not* required prior to submission of progress reports. Progress report submission provides early notice of anticipated next-year funding. Given the high percentage of projects that receive anticipated next-year funding following progress report submission, the COI Office will begin the COI review at this time in order that all requirements are met in advance and award setup is not delayed in the event continuation funding is awarded. Note that regardless of proactive internal processes, progress report submission does not provide certainty that a project will receive additional funding.

COI Office – Upon receipt of a continuation notification in eCompliance, the COI Office works with the PI/DRA to confirm that the Investigator Form (IF) and Scope of Work (SOW) on file are complete and accurate for the anticipated continuation period. The COI Office sends a “Review/Update IF & SOW” notification by email and works with the PI/DRA as needed to complete the process. The COI Office notifies OSPA of any updates submitted.

For any previously reported FCOI, the COI Office submits an annual FCOI report at the time of continuation application submission.

In anticipation of next-year funding, the COI Office and OSPA follow procedures as outlined in Section II above.

Responsibilities

Below is an outline of responsibilities as they relate to this process during the project.

Principal Investigator:

- Work with the DRA to report any change in Investigators by way of a revised IF.
- Report all sponsored travel within 30 days of the trip; ensure all Investigators report sponsored travel.
- Report any new or changed outside interests within 30 days of acquisition/discovery; ensure all Investigators report new or changed outside interests.

Departmental Research Administrator:

- Work closely with the OSPA Post-award Team for compliant and consistent post-award administration.
- Work with the PI to complete and submit a revised IF upon any notice of a change in Investigators on a project.
- Await COI Office approval before processing appropriate payroll changes to the project.
- Work with OSPA to notify the COI Office when submitting a continuation application or annual financial and/or technical reports so any necessary FCOI reports can be submitted concurrently.
- Work with OSPA to notify the COI Office upon learning of a change in Investigators or outside interests or an instance of sponsored travel.

Office of Sponsored Programs Administration:

- Submit revised IFs to the COI Office by email at coi@missouri.edu upon receipt from the PI and/or Department/Division.
- Notify the COI Office when submitting to the sponsor an Investigator Change Request.
- Notify the COI Office when submitting a continuation application or annual financial and/or technical reports.
- Notify the COI Office upon learning of a change in Investigators or outside interests or an instance of sponsored travel.

COI Office:

- For continuation applications (including No Time Cost Extensions), confirm that the IF and SOW on file are complete and accurate for the anticipated continuation period.
- Ensure that all new Investigators on a project complete an OIDF and the Conflict of Interest Training.
- Notify OSPA of COI Office approval of any new Investigator on a project.
- Facilitate development of a management plan for identified FCOIs.
- Submit to sponsor an FCOI report within 60 days of determining that a new or newly discovered FCOI exists.
- For any previously reported FCOI, submit an annual FCOI report at the time of renewal application.
- Upon notification of continuation application, submit necessary FCOI reports concurrently.

Need Help?

Contact OSPA at muresearchospa@missouri.edu or (573)-882-7560.

Related Topics

[Advance and Pre-award Accounts](#)

Creation Date

08/23/2012

Latest Revision Date

08/27/2015

Office of Sponsored Programs Administration
115 Business Loop 70W | Columbia, MO 65211-0001
573-882-7560 | grantsdc@missouri.edu

APPENDIX 1. EXTERNAL INVESTIGATORS

When a PI has identified an external (non-MU) Investigator, MU must arrange for the management of the Investigator's conflicts in one of two ways, described below. If neither option is viable, the external Investigator must be removed from the project.

Note: Not all collaborators and consultants meet the definition of Investigator. If the PI determines that the individual's role on the project does not rise to the level of Investigator, the individual should be listed as an Other Significant Contributor (OSC) on the [Research & Related \(R&R\) Senior/Key Person Profile form](#) and the requirements under the PHS COI Rule do not apply.

1. MU SUBRECIPIENT: Include in the proposal a subcontract with the Investigator's employer and obtain certification of the employer's COI policy (preferred method).

- Generally (but not absolutely), the external Investigator's role will be co-Investigator (co-I) or co-Principal Investigator (co-PI).
- Prior to proposal submission, subrecipients on all proposals subject to the revised PHS FCOI regulation must certify as to the institution/organization's Conflict of Interest policy.

a. Subrecipient Commitment Form: COI Assurance

2. Conflict of Interest

42 CFR Part 50.604 requires that institutions conducting PHS-funded research "Maintain an up-to-date, written, enforced policy on financial conflicts of interest." Further, "If the Institution carries out the PHS-funded research through a subrecipient (e.g., subcontractors or consortium members), the Institution (awardee Institution) must take reasonable steps to ensure that any subrecipient Investigator complies with this subpart by incorporating as part of a written agreement with the subrecipient terms that establish whether the financial conflicts of interest policy of the awardee Institution or that of the subrecipient will apply to the subrecipient's Investigators."

Subrecipient hereby certifies that it has a conflict of interest policy that complies with 42 CFR Part 50, Subpart F, "Responsibility of Applicants for Promoting Objectivity in Research." Subrecipient also certifies that, to the best of the organization/institution's knowledge (1) all financial disclosures have been made related to the activities that may be funded by or through a resulting agreement and required by its conflict of interest policy; and (2) all identified conflicts of interest have or will have been satisfactorily managed, reduced, or eliminated in accordance with subrecipient's conflict of interest policy prior to the expenditure of any funds under a resulting agreement.

Subrecipient does not have a conflict of interest policy that complies with 42 CFR Part 50, Subpart F.

Note: The Curators of the University of Missouri will evaluate on a case-by-case basis each proposal including a subrecipient that does not have a conflict of interest policy that complies with 42 CFR Part 50, Subpart F. The Curators of the University of Missouri will not submit to a PHS agency any application including such subrecipients prior to review and resolution.

Not applicable because this project is not funded by the NIH, AHRQ, ATSDR, CDC, FDA, HRSA, IHS, SAMHSA, or any other sponsor that has adopted these federal financial disclosure requirements.

The Departmental Research Administrator (DRA) sends the [Subrecipient Commitment Form](#) (SCF) to be completed by the subrecipient and signed by the Subrecipient Authorized Official. For projects subject to the revised PHS FCOI regulation, a completed SCF indicates to MU that (1) the subrecipient institution/organization has a publicly accessible COI policy that complies with the PHS regulation and will timely submit required reports to MU, or (2) the subrecipient institution/organization does not have a compliant policy and therefore must adopt one, rely on MU's policy, or be removed as an Investigator on the project.

If a subrecipient does not have an active and enforced FCOI policy, the DRA should work with the SGCA to notify the COI Office immediately. In most circumstances, a subrecipient may not rely on the MU COI policy. The COI Office will take the lead in offering the subcontractor the [FDP Model Financial Conflict of Interest Policy and Model Disclosure Form](#) for adoption.

The DRA submits the completed and signed SCF(s) to OSPA as part of the proposal package. OSPA reviews the SCF(s) to verify that the proposed subrecipient institution(s) has certified that it has a publicly accessible FCOI policy compliant with PHS regulations.

At award, OSPA will utilize the [FDP Subaward Agreement Forms](#), which include language relevant to the FCOI regulation. Additional language will be added as needed on a case-by-case basis.

The COI Office will review FCOIs submitted to MU by any subrecipient on a project and will submit their reports to the sponsor at award and annually, as specified in the regulation.

b. Federal Demonstration Partnership (FDP) Institutional Clearinghouse for Certification of Institutional Compliance with PHS FCOI Requirements

The FDP hosts a Clearinghouse of institutions and other entities that have attested as to their compliance with the revised PHS FCOI regulation. The [FDP Clearinghouse](#) is intended for use by recipients of PHS funding to verify they compliance of their potential subrecipients with these regulations. MU is enrolled in the FDP FCOI Clearinghouse:

Institutional Certification of Compliance with PHS FCOI Regulations as of 8/24/12

The institution below has certified on the FDP Clearinghouse that they are or will be compliant with PHS FCOI Regulations as of 8/24/12.

Institution Name	The Curators of the University of Missouri - Columbia
Authorized Representative	Jill Ferguson
Authorized Representative Title	Senior Fiscal Analyst, Office of Sponsored Programs Administration
Authorized Representative Email Address	fergusonjs@missouri.edu
Primary DUNS Number Optional	153890272

2. SUBSUMED INVESTIGATOR: Bring the individual under MU's COI Policy (acceptable method only if subcontracting to the individual's employer is not an option).

Note: Including in the proposal a subcontract with the Investigator's employer and obtaining certification of the employer's COI policy (option 1, above) is preferred; a contractual relationship between entities provides sufficient evidence to MU that the employer has assumed legal liability for the external actions of its employee. Where no contractual relationship exists, an employer's FDP Clearinghouse certification or Letter of Commitment (including with Authorized Organizational Representative signature) does

not provide sufficient evidence of institutional responsibility, and the individual must be subsumed under MU's COI Policy.

- The PI/DRA should work with the SGCA, who will contact the COI Office, to determine required disclosure/certification. The COI Office will review, submit for necessary approvals, and then, if appropriate, work with the external Investigator to file a disclosure prior to proposal submission.
- Generally, the external Investigator's role will be collaborator or consultant.

APPENDIX 2. FCOI QUICK REFERENCE GUIDE FOR DRAS

(next page)

FCOI Quick Reference Guide for DRAs

For full procedures, refer to “Financial Conflict of Interest under the 2011 Revised PHS Regulation” and “Financial Conflict of Interest in NSF-Funded Research” in the *OSPA Sponsored Programs Procedure Guide*.

For each **PHS*** proposal (including those for which MU is the subrecipient):

*Includes all sponsors having adopted the PHS FCOI Rule. Refer to the [Investigator Form](#) for a complete listing.

At proposal, the DRA should:

1. Work with the PI to complete the Investigator Form (IF), listing [all Investigators](#) (MU and non-MU).
Note: All Senior/Key Personnel and OSCs on the R&R Senior/Key Person Profile form must be listed on the IF.
2. Verify that all MU Investigators listed on the IF have filed an ODF within the previous 12 months. If an MU Investigator does not have a current ODF on file, provide guidance to the MU Investigator to access [eCompliance](#) or alert the SGCA.
3. For any [subrecipient](#) Investigator, obtain a Subrecipient Commitment Form (SCF) and confirm COI policy certification. If the subrecipient indicates that it does not have a compliant policy, work with your SGCA to contact the COI Office.
4. For any [non-subrecipient](#) external Investigator, work with your SGCA to contact the COI Office.
5. Submit to OSPA the following: (1) IF, (2) eCompliance ODF status screenshots, (3) SCF, if applicable.

Proposals will not be submitted until it is confirmed that all MU Investigators have a current ODF on file and all non-MU Investigators have made appropriate disclosures/certifications.

At award:

- The SGCA will notify the COI Office upon receiving a Pre-Award Account request, Notice of Award, or any other indication of funding or intent to fund.
- All MU Investigators must complete eCompliance COI Training.
- Agreements requiring University signature can be executed during the COI review process; however, the award cannot be set up until the COI review is complete and OSPA received COI Office approval.

The COI Office will ensure all requirements are met and then notify OSPA. Projects will not be awarded prior to COI Office approval, regardless of the sponsor’s awarded start date.

During the project:

- All Investigators must (1) disclose new outside interests by submitting an ODF within 30 days, (2) report sponsored travel within 30 days, (3) disclose SFIs annually, and (4) complete COI Training at least every four years.

Change in Investigators: Before the PI adds a new Investigator to an ongoing project, the COI Office must complete a review to ensure compliance with all requirements. **The DRA should:**

- Work with the PI to complete and submit a revised IF upon any notice of a change in Investigators on a project.
- Await COI Office approval before processing appropriate payroll changes to the project.

For each **NSF** proposal (including those for which MU is the subrecipient):

At proposal, the DRA should:

1. Work with the PI to complete the Investigator Form (IF), listing all [MU Investigators](#).
Note: External partners (e.g., non-MU co-PI, non-MU Collaborator) are not included in the definition of “Investigator” as promulgated in the [NSF Conflict of Interest Policies](#); therefore, [individual disclosures or institutional certifications from external partners are not required](#).
2. Verify that all MU Investigators listed on the IF have filed an ODF within the previous 12 months. If an MU Investigator does not have a current ODF on file, provide guidance to the MU Investigator to access [eCompliance](#) or alert the SGCA.
3. Submit to OSPA the following: (1) IF, (2) eCompliance ODF status screenshots.

Proposals and pre-proposals will not be submitted until it is confirmed that all MU Investigators have a current ODF on file.

At award:

- The SGCA will notify the COI Office upon receiving a Pre-Award Account request, Notice of Award, or any other indication of funding or intent to fund.
- All MU Investigators must complete eCompliance COI Training.
- Agreements requiring University signature can be executed during the COI review process; however, the award cannot be set up until the COI review is complete and OSPA received COI Office approval.

The COI Office will ensure all requirements are met and then notify OSPA. Projects will not be awarded prior to COI Office approval, regardless of the sponsor’s awarded start date.

During the project:

- All MU Investigators must (1) disclose new outside interests by submitting an ODF within 30 days, (2) disclose SFIs annually, and (3) complete COI Training at least every four years.

Change in Investigators: Before the PI adds a new Investigator to an ongoing project, the COI Office must complete a review to ensure compliance with all requirements. **The DRA should:**

- Work with the PI to complete and submit a revised IF upon any notice of a change in Investigators on a project.
- Await COI Office approval before processing appropriate payroll changes to the project.