Checking Compliance Before Submitting Proposals
Quick Reference Guide

Overview

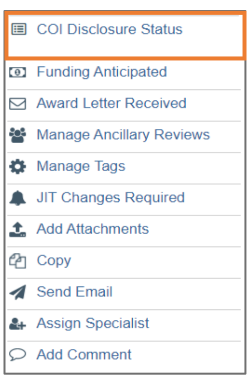
This Quick Reference Guide (QRG) is designed to walk Administrative Contacts through reviewing compliance for Proposals before sending them forward to Specialist Review.

	At the Proposal stage, before submitting for Specialist Review, the only required compliance check is: • The **COI Disclosure Profile.** Ensure this has been updated for all FCOI Investigators in the last year. Optional checks at the Proposal stage to expedite the process later are: • Training status • Patent Policy

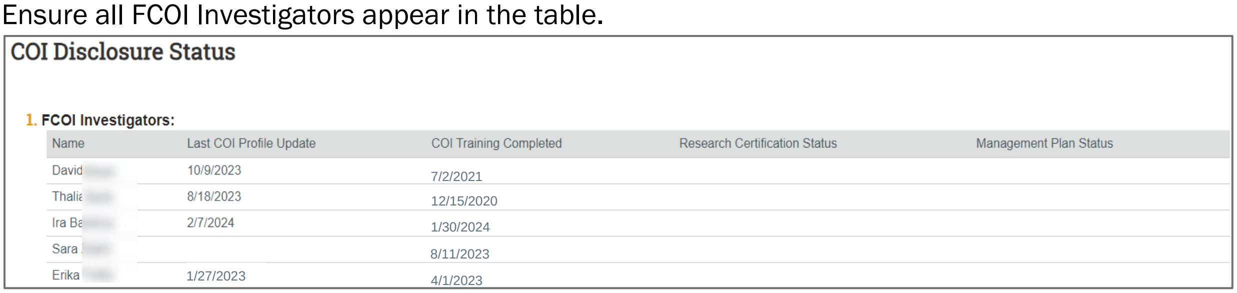
Required at Proposal

Check COI Disclosure Status from the Funding Proposal:

1. Click on **COI Disclosure Status.**



2. Ensure all FCOI Investigators appear in the table.



COI Disclosure Status

1. FCOI Investigators:

Name	Last COI Profile Update	COI Training Completed	Research Certification Status	Management Plan Status
David	10/9/2023	7/2/2021		
Thali	8/18/2023	12/15/2020		
Ira Ba	2/7/2024	1/30/2024		
Sara		8/11/2023		
Erika	1/27/2023	4/1/2023		

If you do not see all FCOI Investigators in the table when you click COI Disclosure Status, there could be multiple reasons:

- The person was not added to the list of Personnel on the proposal.
- The person was added to the list of Personnel but not identified as an ***investigator for compliance purposes*** at the appropriate step.

In a Proposal, before the "Pending Sponsor Review" state, you can correct this by doing the following:

Click on the Personnel section of the Proposal:

- If the person is not listed in the Personnel section at all: **Add** the individual in the Personnel Section, ensuring that Question 3 is answered Yes, indicating they are an ***investigator for compliance purposes***.
- If the person is listed in the Personnel section: **Edit** the individual in the table of personnel to ensure Question 3 is answered Yes, indicating they are an ***investigator for compliance purposes***.

3. Once you have ensured that all FCOI investigators appear in the table, view the **Last COI Profile Update** for each person, ensuring that you see a date that is **within the last year:**

Last COI Profile Update
10/9/2023
8/18/2023
2/7/2024
1/27/2023

A blank space indicates that <u>no Disclosure Profile Update has been completed</u> or an error occurred, and the date was not brought over from the legacy system.

The date **1/27/2023** is a default date for anybody who has already been in the system but whose <u>Disclosure Profile</u> has not been completed in RUVA.

4. Prompt Investigators to update their disclosure profile, if out of date, by doing the following:

   - Click **Send to COI.** This will send them a system-generated notification to update their disclosure profile.

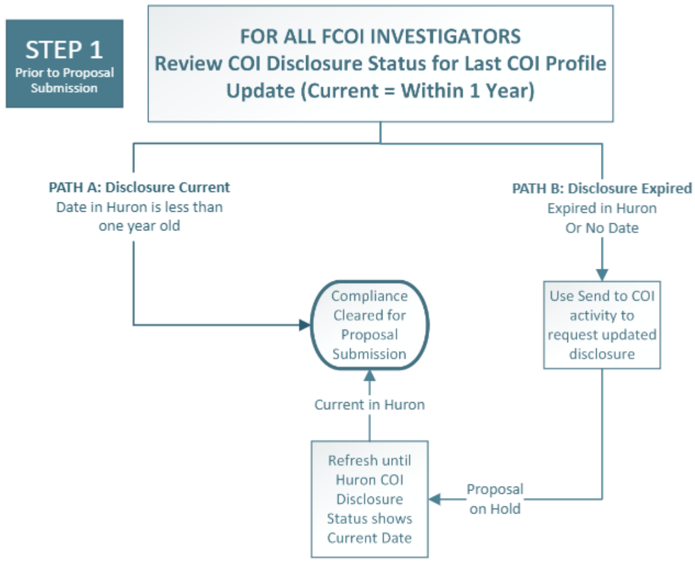


Figure 1: Workflow Diagram

Optional at Proposal

To expedite the process later, you may wish to check the following additional compliance requirements at the Proposal Stage. However, do not hold up submitting the Proposal for Specialist Review. Instead, use the opportunity to communicate to investigators that there are additional compliance requirements.

Training:

1. Use the **COI Disclosure Status** to check the status of **COI Training**. Ensure the training has been completed and is not expired (COI training is a recurring requirement every four years).

COI Training Completed
7/2/2021
12/15/2020
1/30/2024
8/11/2023
4/1/2023

2. Use the [Research Conflict of Interest UBI Report] to check the status of **Undue Foreign Influence** training. Ensure the training has been completed (this is a one-time requirement).

3. If training is out of date, send a reminder email to the Investigator. Clicking **Send to COI** will not provide them with instructions on completing training.

Patent Agreement Policy:

1. Use the [Research Conflict of Interest UBI Report] to check the status of the Patent Policy. Ensure it is current and email the Investigator with a reminder to complete this if it is not.