Conflict of Interest (COI) Lifecycle

	PRESUBMISSION REVIEW	POSTSUBMISSION REVIEW

OSP

DISCLOSURE DEADLINE

TRAINING DEADLINE

- Is Disclosure complete? — No / Yes
- Submit proposal to Sponsor
- Sponsor funds proposal? — Yes / No
- Just in Time or Notice of Award received
- Is COI training complete? — Yes / No
- Significant Financial Interest (SFI)? — No / Yes
- UVA disapproves funding
- Create award in Oracle

VPR

- RO adds Investigator to the Disclosure System
- Notify Investigator of any non-compliance
- Evaluate for SFI relatedness
- SFI relatedness exists? — No / Yes
- No COI
- Conflict of Interest (COI) Committee and RO make a final determination — COI
- Work with Investigator to manage COI
- Is COI manageable? — No / Yes
- RO reports outcomes from committee to Investigator, sponsor, IRB, and OSP

School/Department

- Grant Specialist accesses COI module in UBI[2]
- Is Investigator current for disclosure and training?[3] — Not in COI module / In COI module, not current / Yes
- Notify Investigator of any non-compliance.
- Confirms disclosure is complete and signs off on PRF (along with School)

Investigator[1]

- Investigator desires to submit a proposal
- Complete any unmet requirements:
  1. Training
  2. Disclosure
  3. Training & Disclosure
- Complete proposal Routing Form (PRF)
- Receives denied proposal
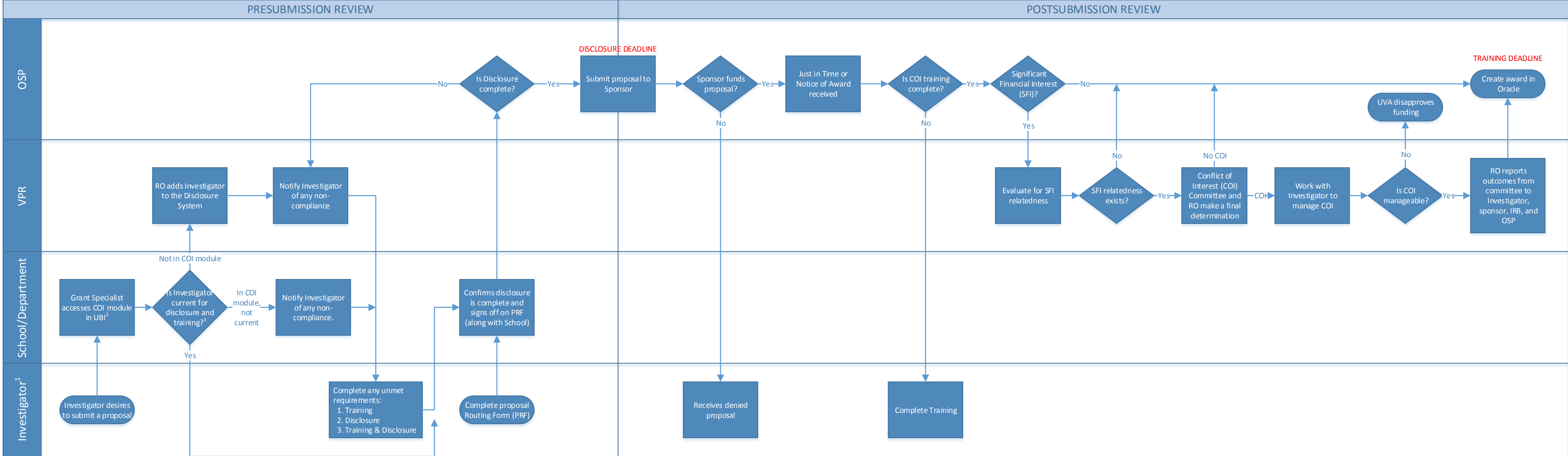- Complete Training

[1] Investigators can be any individual who is responsible for the design, conduct, or reporting of research on a proposal – regardless of title. Investigators apply to more than PI.
[2] Instructions on how to access and use of the COI module are available in the UBI Community or from the COI website.
[3] Per RES-005 (http://uvapolicy.virginia.edu/policy/RES-005), Investigators must have a current disclosure on file prior to submitting a proposal. Training must be current before work can but it's considered a best practice to check status at the time of proposal and let the Investigator know if his/her training is not current or will expire soon.

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