Conflict of Interest (COI) Lifecycle

**PRESUBMISSION REVIEW**

1. Investigator desires to submit a proposal
2. Notify Investigator of any non-compliance
3. Complete any unmet requirements:
   1. Training
   2. Disclosure
   3. Training & Disclosure

**DISCLOSURE DEADLINE**

- Investigator submits proposal to Sponsor

**OSP**

- OSP adds Investigator to the Disclosure System
- Notify Investigator of any non-compliance
- Confirm disclosure is complete and signs off on PRF (along with School/Department)

**DISCLOSURE DEADLINE**

- Investigator submits proposal to Sponsor
- OSP adds Investigator to the Disclosure System

**POSTSUBMISSION REVIEW**

- Investigator completes cycle of both training and disclosure
- OSP notifies investigator of any non-compliance
- Conflict of Interest Committee and RO make a final determination
- RO adds Investigator to the Disclosure System
- OSP adds Investigator to the Disclosure System
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**TRAINING DEADLINE**

- Complete proposal Routing Form (PRF)
- Is Investigator current for disclosure and training?

**Investigator**

- Investigator desirous of conducting research on a proposal – regardless of title
- Investigators apply to more than PI
- Instructions on how to access and use of the COI module are available in the UBI Community or from the COI website
- 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 begin, but it is 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.