Streamlining COI
New Annual Conflict of Interest Procedure
(National Science Foundation Investigators)

Nadia Wong
COI Administrator
These NSF procedures also apply to agencies and organizations adopting the National Science Foundation (NSF) Conflict of Interest Policy.
Main Changes for NSF Investigators

• No Financial Interests: Complete the Annual Disclosure every 12 months
• Financial Interests: Complete the Annual Disclosure (every 12 months) and the NSF Disclosure (for each new proposal)
  – NSF Disclosure has been shortened to one question
Benefits

- Less forms
- Less questions
- Disclosure tracking
- Automated email reminders
 KC COI Disclosures

Investigator: An individual responsible for the design, conduct, or reporting of the funded research project

- Annual Disclosure
- NSF Disclosure
- Master Disclosure
Change: Annual Disclosure

New section in Zot!Portal under the Research tab for KC COI

Click “Create/Update Annual Disclosure”
Question 1- Disclosure transaction type

Investigators primarily select “No”

- “Yes” indicates: A “new SFI” that requires additional COIOC review
  - New SFI includes:
    - A different type of SFI (e.g. royalty payment vs. income) from previously disclosed entity
    - A SFI from a new entity
Question 2- Disclosure of significant financial interests excluding travel

- Income (honoraria, consulting income, etc.)
- Equity interests (stock, stock options, and other ownership interests)
- Royalty Payments (from intellectual property not assigned to UC Regents)
Question 3- Disclosure of sponsored or reimbursed travel

• Remember to consider the listed travel exclusions
• Investigators who are not involved in any PHS or PHS compliant projects do not need to complete the Travel Log
Click “submit.”

You completed your Annual Disclosure!

Note: Only Investigators have access to their own Annual Disclosures.
**Change:** Update SFIs electronically

To update or report a new SFI excluding travel, select “Yes” to the first question of the Annual Disclosure.

The Annual Disclosure Questions 2 and 3 should reflect all of your current financial interests in addition to the new SFI.
Jun 2016
• First Annual Disclosure completed (disclosed Google equity interests)

Jul 2016
• New sponsored travel: NSF Investigators do not need to disclose (no action necessary)

Jan 2017
• Receive $10,000 (a new SFI type) from Google- Update Annual Disclosure by selecting “Yes” for Question 1 in the Annual Disclosure

Nov 2017
• Notified Annual Disclosure about to expire (11 months after last Annual Disclosure) - Submit a new Annual Disclosure and select “No” for Question 1 since this is a standard Annual Disclosure
Change: NSF Disclosure (replaces Form 900)

If you answered “yes” to the Annual Disclosure second question, then you must complete the NSF Disclosure for each NSF proposal that lists you as an Investigator.

Answer the one question and click “submit”
Change: Master Disclosure

Master Disclosure: View all of your completed past disclosures
New Proposals
Change: List all UCI Investigators on the project.

- List all individuals that previously would have completed a Form 900 for this project
- Listed Investigators will be notified if they have not completed the necessary disclosures.
To add an individual, click the magnifying glass icon.

Search the name/UCInetID and click "return value".
• Select the Proposal Role
• Click “add person”
• Repeat until all Investigators have been added

For more information, visit http://www.research.uci.edu/compliance/conflict-of-interest/research-disclosures/nsf-investigator.html
Change: Updated two COI Questions

If yes:

- Subrecipient-
  Upload the NSF Form 900SRs in subrecipient package

- Non-UCI Investigators-
  Upload NSF Form 900SRs as separate labeled file
Change: Disclosure tracking

All disclosures must be completed before proposal is submitted to sponsor.
**Change:** Request Annual Disclosure email (optional)

Personnel tab: Click “request annual disclosure” to send an email to Investigators with incomplete Annual Disclosures.

Note: Template email will include all Investigators so please delete those Investigators who have already completed their disclosures.
Transition Period

Proposals created before June 23rd (KC COI Implementation) will have a choice:

Complete the old (current) process
- Must NOT update the KC Questionnaire when prompted after June 23rd (ignore prompt)
- Must upload disclosure forms labeled as “NSF Financial Disclosure Form 900” and answer old COI questions before June 23rd

Use the new KC COI process
- Updated the KC Questionnaire
- Disclosure forms not labeled and uploaded and/or old COI questions not completed before June 23rd
- Process:
  - Update the KC Questionnaire when prompted to answer the updated COI questions
  - Add all Investigators in the Personnel tab and have Investigators complete the Annual Disclosures
Are you ready?
Startup Steps: Today

Transition Period: in progress proposal applications that will be completed after June 23rd

• Old/Current Procedures
  • Upload and label Form 900 disclosures and complete the current COI questions
  • Do NOT update the KC Questionnaire- ignore prompt

• New KC COI Procedures
  • Do NOT collect Form 900 disclosures
  • Update the KC Questionnaire after June 23rd when prompted, list all UCI Investigators on the Personnel tab, and answer the updated COI Questions
Startup Steps to Success: Day 1 of KC COI

All Investigators
• Complete the Annual Disclosure

Initiators
• Include all Investigators in the Personnel tab and answer the updated COI Questions when submitting a new NSF proposal
<table>
<thead>
<tr>
<th>KC COI Email Notification</th>
<th>Action</th>
</tr>
</thead>
<tbody>
<tr>
<td>Action Item/Action Required</td>
<td>Respond as soon as possible to avoid delays in processing your project</td>
</tr>
<tr>
<td>Reminder</td>
<td>Respond if applicable (ex. you need to update your financial interests or your Annual Disclosure is about to expire)</td>
</tr>
</tbody>
</table>
Training Opportunities

• KC COI Office  Hours: June 2016
  – Sign up in UCLC, search “KC COI”
  – Opportunities to see KC COI up close in the computer lab and have more personalized training

• One-on-One Training (only by request: email eRA@research.uci.edu)
Resources

• KC COI Overview Video: https://www.youtube.com/watch?v=qpbITiOfXs
• Tips and Training (eRA website): http://www.research.uci.edu/sponsored-projects/era/index.html
Contacts

• KC COI Questions: era@research.uci.edu

• Conflict of Interest Questions:
  – Amy Green (COI Analyst), acgreen1@uci.edu
  – Nadia Wong (COI Administrator), nadiaw@uci.edu