Research Administration Practices (RAP) Sessions

Sponsor Requirements Certification and COI (Part 2)

Presented by:

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Introductions

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Agenda

• Kuali Coeus: KC Certification/COI rules and requirements
  • Quick recap of Part I COI presentation
  • Sponsor Requirements in KC
  • Proposal Type
  • Activity Type (Fellowships)
  • Senior/Key Persons: Employee vs. Non-Employee, MIT Guest Account
  • KC Key Personnel: Role
  • Supplemental Info > COI. Discl. Req. (PC, PCK)
  • Notify for certification
  • Summary/Submit: SFI flag(s)
  • COI Disclosure requirement (validation error)
Key Points from COI Part I

- **COI Policy Purpose**: Promote objectivity in research by increasing transparency, accountability and oversight of financial interests of investigators in federally sponsored research.

- **Roles in which carry COI disclosure (& training) requirements**: Those responsible for the design, conduct, or reporting of research such as Investigator, Co-Investigator, Key Person (sponsor specific).

- **COI disclosure process**: Begins at proposal stage, continues for project period.

- **2 distinct and independent reporting processes at MIT**: COI and OPA. OPA is annual and is focused on time spent on outside activities; COI is rolling and focused on financial activities which could impact research.

- **COI disclosure module and process is not designed to allow proxies**: The investigator is required to complete and certify that information is accurate.
Required to disclose “Sponsored Travel” which means all travel which meets the definition is considered an SFI by sponsors that follow PHS regulations. Looking back 12 months at time of proposal and ‘running’ thereafter.

• Just travel (hotel, meals, transportation, etc…)
• If aggregate per entity adds to $5k over last 12 months
• Travel and consulting
• If aggregate per entity adds to $5k over last 12 months
• Travel by Investigator and his/her Family
• Investigator completes a separate disclosure for each traveler ‘type’

“Sponsored Travel (applies only to PHS Investigators) means (a) travel expenses paid to an Investigator or travel paid on an Investigator’s behalf, by a single entity in any 12-month period and (b) travel reimbursed to or paid on behalf of an Investigator’s Family by a single entity in any 12-month period ONLY if such travel reasonably appears to be related to the Investigator’s Institutional Responsibilities. See the PHS Addendum for more information.”
• Investigator reports travel in Coeus
• DLCI administrators may assist with tracking for aggregate amounts.
A. Prof. Sam Malone

$9,500 \textbf{Travel expenses} for speaking at forum: airfare, gas, car rental, hotel room, and meals.

\textbf{Paid by: Australia Department of Climate Change, Energy, the Environment and Water}

B. Prof. Rebecca Howe

$5,500 \textbf{Travel expenses} for speaking at conference: airfare, hotel room, and meals.

\textbf{Paid by: National Science Foundation (NSF) funded Award at MIT (PI Howe)}
Investigators (PI/Co-I) at Proposal stage must complete proposal certification which includes 3 SFI screening questions.

Many sponsors follow the PHS/NIH regulations that has a COI requirement for Key Persons (at proposal stage these Key Persons complete 3 COI screening questions).

Sponsors that do not follow the PHS/NIH regulations will not have any requirement for Key Persons.
The U.S. Department of Energy (DOE) has issued Interim Conflict of Interest Policy Requirements, which will affect DOE Awards issued to proposals submitted on or after 12/20/2021. The interim policy is designed to mirror the PHS (NIH) COI regulations. Key requirements from the DOE interim policy:

• In addition to PIs and Co-Is, Key Persons will be required to complete proposal certifications in KC at proposal stage.

• PI, Co-I’s and Key Persons will be required to complete COI disclosure and COI training before funds can be expended at award stage.

• The COI office will be reaching out to affected PIs, Co-Is and key persons, and their Administrative Officers with detailed instructions on how to comply.

• Please note that this an Interim Policy. More detailed information will be provided as it becomes available. For policy-related questions, please contact coi-help@mit.edu; issues encountered during the proposal or award process should be directed to your RAS contract administrator.
Proposal Certification/COI Screening Question requirement is based on:

- Sponsor (COI Hierarchy)
- Proposal Type
- Key Personnel Role (Employee/Guest, Non-Employee)
- Supplemental Information - COI Discl. Req. (manually overrides COI hierarchy)
Many Proposal Types, including New, Renewal, and Supplement require certification.

Budget-SoW Update and Progress Report do not require certification.

If there is a change in Key Personnel, a Proposal Type that requires certification must be used.

Please refer to the Proposal Types Reference Card for definitions and appropriate use.
If a key person external to MIT is required to certify (e.g., KP role “Fellow”, “Co-Mentor”):

1. The DLCI must sponsor a guest account through IS&T. Guests complete registration and create a Kerberos ID.

2. The Guest Employee Account must then feed to KC Overnight.

3. Then the DLCI may add them to the KC proposal as an Employee (the person will have an MIT email address to receive notifications to certify).

If a key person external to MIT is not required to certify (e.g., KP role “Subaward Investigator”, “Other Significant Contributor”, “Consultant”):

1. If not already in KC, the DLCI must request an Address Book Entry (Non-Employee person in KC) through OST or a RAS webform.

2. DST creates the record, and the external person may be added as Non-Employee to a role that does not require certification.
To request a Sponsored Guest account, visit https://sponsored-accounts.mit.edu/

The "Sponsor" denoted on the online form is the individual requesting the sponsored account for an individual.

What the "Guest" receives after their new MIT ID is created by the Service Desk. From here they will register their desired Kerberos name.
NIH Proposal must route by 5 PM for 5-day deadline  
Key Person Role: Other Significant Contributor?

Peter Plum
- committed to contribute to the scientific development or execution of the project
- Budget: .5 Summer Months
- Organization: Stanford University

Peter Plum doesn’t have an MIT Employee record in KC (External person with guest MIT Kerberos required to complete Proposal Certification/COI screening).

Which of the following should you do next (select all that apply)?
- Assign **Other Significant Contributor** role (doesn’t require COI/Certification)
- Request a 5-day deadline waiver (proposal will not route on time)
- Request a Sponsored Guest MIT Account
- Remove Peter Plum from the KC Proposal and route the proposal
Certain key person roles, including **Other Significant Contributor**, **Consultant**, and **Subaward Investigator** are exempt from COI requirements. **Notify** button only displays when required.

Note: If a key person external to MIT is required to certify (e.g., KP role “Fellow”), the DLCI must sponsor a guest account through IS&T. Guests complete registration, select a Kerberos, then the DLCI may add them to the KC proposal as an Employee.

See [Adding NIH/PHS Investigators & Key Person Certification for Subaward and multi-PI Proposals](#) for general guidance on who should be listed as Investigators/Key Persons and whether certification is required.
## COI Reference Quick Cards

### Proposal Development

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<tr>
<th>Card Topic</th>
<th>Application</th>
<th>Audience</th>
</tr>
</thead>
<tbody>
<tr>
<td>Adding NIH/PHS Investigators &amp; Key Person Certification for Subaward and multi-PI Proposals</td>
<td>Kuali</td>
<td>Aggregators</td>
</tr>
<tr>
<td>Investigator &amp; Key Person Certification: Non NIH/PHS Sponsor Proposals</td>
<td>Kuali</td>
<td>Aggregators</td>
</tr>
<tr>
<td>Principal Investigator Certification Questions</td>
<td>Kuali</td>
<td>Investigators, PHS(NIH) Key Persons</td>
</tr>
<tr>
<td>Certifying Key Persons and Fellows</td>
<td>Kuali</td>
<td>Investigators, PHS(NIH) Key Persons</td>
</tr>
<tr>
<td>Proposal Certification Questions List</td>
<td>Kuali</td>
<td>Investigators, PHS(NIH) Key Persons</td>
</tr>
</tbody>
</table>

### MIT Person? PI/Multiple indicated? KC Proposal Role Grants.Gov forms Proposal Role MIT KC Required Certification? Description

| Yes | Either | PI/Contact | PD/PI | Yes | An "Investigator" means the project director/principal investigator and any other person who is responsible for the design, conduct, or reporting of research or instructional activities. |
| Yes | Yes    | PI/Multiple (MIT Employee) | PD/PI | Yes |
| No  | Yes    | PI/Multiple (Non MIT Employee, often Subaward Investigator) | PD/PI | No – Managed by Subaward Organization |
| Yes | No     | Co-Investigator (MIT Employee) | Co-Investigator | Yes |
| Yes | N/A    | Key Person | Other | Other Project Role Category: [Key Person Role as entered] | Yes | Individuals who commit to contribute to the scientific development or execution of the project, and DO commit specified measurable effort (i.e., person months) to the project. |
| No  | N/A    | Key Person | Other | Other Project Role Category: [Key Person Role as entered] | Yes (requires DLC to Sponsor Non MIT individual by obtaining an MIT Kerberos ID, which creates an entry in the employee search - see under "To Add Key Persons" below) |
| Either | N/A | Key Person | Other Project Role Category: Other Significant Contributor | No – this role does not meet qualifications of certification and disclosure requirements | Individuals who commit to contribute to the scientific development or execution of the project, but do not commit any specified measurable effort (i.e., person months) to the project. |
| No   | N/A   | Key Person | Other Project Role Category | No – this role does not meet qualifications of certification and disclosure requirements | Individuals who generally provide a ‘fee for service’ and do not typically conduct research. They may provide insight and expertise to the PI but independently are |

Solicitation specific: If a solicitation’s COI Disclosure requirements differ from what is typically required by the sponsor, the Supplemental Information - COI Discl. Req. must be manually changed.

Fellowships: Proposals with Fellowship – Pre-Doctoral or Fellowship – Post-Doctoral Activity Type, both the fellow and the faculty sponsor must certify. Fellows are listed as a Key Person. If the Sponsor is in a COI Hierarchy that does not require KP disclosure, the Supplemental Information - COI Discl. Req. must be manually changed to include Key Personnel (PCK).
If the **Supplemental Information - COI Discl. Req** pull-down menu says “Select”, it indicates that no changes were made.

A proposal Aggregator may select:

- **PC** – PI and Co-I(s) (no Key Person COI requirements)
- **PCK** – PI, Co-I(s), and Key Person(s)
- **N/A** – Not Applicable (mechanism to deselect)

- **Supplemental Information - COI Discl. Req** should only be used when the solicitation has COI requirements different than the sponsor typically requires.
When PI, Co-I, and/or Key Person are required to certify in a proposal, the Aggregator clicks the **Notify** button and an email with a direct link is sent.

### Key Personnel

<table>
<thead>
<tr>
<th>Name</th>
<th>Position</th>
<th>Certification Status</th>
</tr>
</thead>
<tbody>
<tr>
<td>Cariolo, Ian C (Principal Investigator)</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Davis, Andrew (Key Person: Fellow)</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Gold, Alexandra (Key Person: Co-Mentor)</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

The Aggregator can notify each individual by clicking the **Notify** button next to their name.
REMINDER: Proposal Certification is not COI, and COI is not proposal certification.

Only when answering YES to either 10, 11, or 12 (the SFI screening questions in the certification) does there become a COI implication at proposal phase.
PI/Co-I/KP certifies. If the answer to any of the three COI Screening questions is **Yes**, then the certifier is prompted to complete a COI disclosure.

**KC** will not allow a proposal to route for internal approval until all COI certification and disclosure requirements are met.
MyCOI – MIT’s COI disclosure module
When in doubt, as the Aggregator of the proposal, you have the ability to see the certification answers.
To determine whether or not the Key Person(s) has completed a disclosure, one can check within the proposal via the COI Disclosure Status button:
Q: If I've received an email from KC that all certifications are complete, why is the KC proposal validation telling me that the Disclosure is not completed?

A: The email you receive from KC is only attesting to the certification questions having all been answered. The act of completing a proposal COI disclosure is a separate action outside of KC.
Proposal Aggregator (DLCI) Notifications

- The proposal Aggregator receives email notification when all the Key Personnel have certified.
- Email notification does not provide information on COI Disclosure status (KC validation indicates if COI disclosure is required for submission to route for internal approval).
When a PI/Co-I/KP certify in a proposal that they have an SFI, the CAs see the flag in KC during Proposal Review on the Summary screen and notify Jeff and Rupinder.
Initial Award Setup

New Award is set up in **Hold** while reviewed for compliance, including COI disclosure or CITI COI training (if required by sponsor). MIT Conflict of Interest Officers contact the PI/Co-I and Lead Unit with instructions for completing COI and training requirements.

See VPR/RAS Intranet [New COI Hold Procedure](#) for guidance
Printing the Notice of Award from KC

Click Show

Print
If the **Supplemental Information - COI Discl. Req** menu was used to select solicitation specific COI requirements, the selection will display in the Award. If it says “Select”, changes were not made.

**COI Discl. Req** options:
- **PC** – PI and Co-I(s) (no Key Person COI requirements)
- **PCK** – PI, Co-I(s), and Key Person(s)
Professor Hector J. Peabody is scheduled to present at a conference in Vienna. His annual COI disclosure is due. He asks if you can complete it for him (he is too busy). You should (select all that apply):
A. Ask him for documentation so it is accurate and complete
B. Contact coi-help@mit.edu for delegate access
C. Explain that the disclosure must be completed by him
Automated reminder to PI to update COI disclosure two months before disclosure expiration.

If disclosure not updated, automated reminder to PI, CA, Department one month before expiration.

If disclosure not updated, automated reminder to Dean, PI, Department seven days before expiration.

If disclosure expired, COI sends PI, Department, CA final deadline before accounts are restricted.

If final deadline not met, COI restricts account.

Department adjusts for restricted account.

Department reminds PI to disclose or notifies CA that PI left MIT.

PI revises COI disclosure.

COI Officer Review.

If account restricted, hold is removed.

Legend:
- Department responsibilities
- PI responsibilities
- CA responsibilities
- COI responsibilities
- Automated action

PI Transfer Checklist
http://osp.mit.edu/grant-and-contract-administration/managing-projects/when-a-pi-leaves-mit

COI Annual Disclosure Updates
Expiration Reports Available on the COI Website: a great tool for monitoring & compliance

Expiring Disclosures—PI:
• Search by entering one PI’s full name. Useful when someone asks, “When does Dr. Wu’s disclosure expire?”

Expiring Disclosures—School
• Shows all PIs by the school that comprises their DLCI. Can be further refined by DLCI

Expiring Disclosures—CA, DLC
• Sorted by CA, then DLCI. This report also shows the account number and title of the award which will be affected if the COI disclosure expires.

Expiring Disclosures—DLC
• Shows all PIs filtered by DLCI.
Expired disclosures: Next steps

- If disclosure expires, last ditch effort to round up the PI are made, an e-mail is sent indicating the accounts to be restricted and the date on which the restriction will be made active.
- DLCIs should work with RAS CA to transfer, terminate, change PI on active awards as per the [PI Transfer Checklist](https://ras.mit.edu/document/exiting-faculty-checklist-2017-03-06).

  Failure to report changes of Investigator/Key Person to Sponsor is a critical compliance issue.

<table>
<thead>
<tr>
<th>COI Notification sent:</th>
<th>Sent to:</th>
</tr>
</thead>
<tbody>
<tr>
<td>1. 60 days - COI disclosures expire in two months</td>
<td>PI</td>
</tr>
<tr>
<td>2. 30 days - COI disclosures expire in one month</td>
<td>PI, cc to AO and CA</td>
</tr>
<tr>
<td>3. 30 days - Conflict of Interest disclosures scheduled to expire in one month (summary list)</td>
<td>AO, cc to CA</td>
</tr>
<tr>
<td>4. 7 days - COI disclosures expire in 7 days</td>
<td>PI, cc to AO, CA</td>
</tr>
<tr>
<td>5. 7 days - COI disclosures expire in 7 days (summary list)</td>
<td>Assistant Dean</td>
</tr>
</tbody>
</table>
Immediate action required: COI disclosures expire in 7 days on February 07, 2023

Coeus.Application@MIT.EDU <Coeus.Application@MIT.EDU>
To: [redacted] Cc: [redacted] coi-help

**Please do not reply to this system-generated Email. Please use coi-help@mit.edu for questions about this notice.**

Dear [redacted],

You are receiving this message because you are an Investigator or key person with active awards or pending proposals from Sponsors that require a valid financial conflict of interest (COI) disclosure for the life of the award. Your current COI disclosure will expire in the next 7 days on February 07, 2023 therefore we request that you follow the instructions below to keep your disclosure valid. FAILURE TO COMPLY WITH THIS REQUIREMENT WILL PUT THE AFFECTED ACCOUNT(S) IN “RESTRICTED” STATUS AND FUTURE CHARGES WILL NOT BE ALLOWED. In some cases we are required to report this delay in disclosure to the sponsor.

To see which of your active awards/accounts will be impacted by an expired COI disclosure, please click here: https://coi.mit.edu/help-and-training/coi-disclosure-expiration-reports

If the award(s) have expired or you are no longer involved with the project(s), please notify us of these changes by hitting "reply all" to this message, otherwise, please follow the instructions below to update and submit your disclosure.

Before you begin:

1. Access to the COI module is made possible by logging in via Touchstone, followed by DUO. If you have technical difficulties logging in with Touchstone or Duo or experience any connectivity issues, please contact servicedesk@mit.edu.
2. Read the updated Financial Conflict of Interest in Research policy at http://coi.mit.edu/policy. You will be asked to certify that you have read the policy during the disclosure process. COI Policy and Process questions should be sent to coi-help@mit.edu.

Instructions for updating your disclosure:

1. Click on https://coeus.mit.edu/coeus/coi.do?Menu_id=004 which takes you to the My COI landing page.
2. Under the "Revise" column, choose "Master Disclosure". If the "Master Disclosure" button is grayed out (not clickable) it means you have a disclosure in progress so please click on the "Other disclosures in Progress" button...
Professor Haskell has received 4 reminders that his annual COI disclosure is due (now due in 5 days). He tells you that he submitted his OPA. You should:

A. Contact coi-help@mit.edu and explain that Haskell submitted disclosure
B. Wait and see if the accounts go into restricted status
C. Explain that OPA is a separate reporting tool and he must follow instructions in the email reminder
If you have COI questions during pre- or post-award, please reach out to your Contract Administrator.
We are providing a QR Code for you to access a RAS-ED feedback survey via your phone or mobile device.

Use the link below to access the form via the web:
https://mit.co1.qualtrics.com/jfe/form/SV_a5cVa01GA
BQnYTC
Helpful Resources

• COI Questions/help: coi-help@mit.edu
• Online COI resources: www.coi.mit.edu