

# Financial Conflict of Interest in NSF-Funded Research

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## Policies

University of Missouri Collected Rules and Regulations sections [330.015](#),

Policy on Conflict of Interest, and [420.030](#),

Conflict with the Interests of Federal Grant Agencies

[University of Missouri-Columbia](#) corresponding [Procedures on Conflict of Interest Management](#)

## Forms

[Investigator Form](#)

Outside Interest Disclosure Form ([eCompliance](#))

## Overview

The National Science Foundation (NSF) Conflict of Interest Policies, contained in the [NSF Proposal & Award Policies & Procedures Guide \(PAPPG\)](#) (updated annually), require each grantee organization employing more than fifty persons to maintain a written and enforced policy on conflict of interest. The organizational conflict of interest policy must require that Investigators, as defined by the policy, (1) disclose significant financial interests at the time of proposal submission to NSF and (2) update financial disclosures during the period of an award, either on an annual basis or as new reportable significant financial interests are obtained. The organizational policy must establish procedures to review financial disclosures, determine whether a financial conflict of interest (FCOI)<sup>1</sup> exists, and determine what conditions or restrictions, if any, should be imposed by the organization to ensure that all conflicts of interest for each award be managed, reduced, or eliminated prior to the expenditure of award funds.

Additionally, University of Missouri Collected Rules and Regulations section [420.030](#), Conflict with the Interests of Federal Grant Agencies, requires that any MU Investigator involved in an NSF- funded grant or contract complete conflict of interest training prior to engaging in research related to the grant or contract and at least every four years thereafter.

Note: Regardless of funding agency (e.g. Department of Defense, Department of Energy, National Science Foundation etc.), for the purposes of complying with university conflict of interest policy, all SBIR/STTR proposals and awards will be entered into eCompliance for oversight by the COI Office.

## **Impact Summary**

For each NSF proposal (including those for which MU is the subrecipient):

### **At Proposal:**

- All MU Investigators named in the proposal must have submitted an Outside Interest Disclosure Form (OIDF) to the COI Office via [eCompliance](#) within the previous 12 months.

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<sup>1</sup> A *financial conflict of interest (FCOI)* is a significant financial interest that could directly and significantly affect the design, conduct, or reporting of research

- The Principal Investigator (PI)/Department must submit an Investigator Form (IF) to OSPA with the grant application and Electronic Proposal Signature Routing Sheet (ePSRS).

**Note: NSF proposals will not be submitted until all requirements are met, regardless of the sponsor's submission deadline.**

#### At Award:

- The MU Conflict of Interest Committee (COIC) will determine whether any outside interests of the MU Investigators impacts the project. If so, the COI Office will work with the MU Investigator to create a management plan.
- All MU Investigators must complete Conflict of Interest Training through [eCompliance](#).

**Note: NSF-funded projects will not be awarded until all requirements are met, regardless of the sponsor's awarded start date.**

#### During the Project:

- No new MU Investigators may be added to an NSF-funded project until they have completed all of the above requirements. The PI/Department must notify the COI Office before adding personnel.
- Prior to acquiring any new outside interests or any changes to existing interests, investigators must update their OIIF in eCompliance.

### Risk

An organization's failure to comply with the NSF conflict of interest policies may result in a variety of actions at the discretion of the sponsor, including but not limited to imposing special conditions on a grant, terminating an award, and refusing future funding. At the University level, the COIC has the authority to recommend sanctions of an employee for failure to cooperate with or violation of COI policy (CRR 330.015 A.3; CRR 420.030 F).

### Quick Links

#### Sections

- I. [At Proposal](#)
- II. [At Award](#)
- III. [During the Project](#)

#### Appendix

1. [FCOI Quick Reference Guide for DRAs](#)

## SECTION I. AT PROPOSAL

### Procedure

*Principal Investigator (PI)* – The PI completes the [Investigator Form](#) (IF) for the NSF proposal, with the

assistance of the COI Office as needed.

**Note:** The PI's physical signature, stated approval by email, or electronic signature (by way of direct submission to OSPA) are acceptable approvals of the IF.

*Departmental Research Administrator (DRA)* – The DRA works with the PI to complete the IF and accesses the eCompliance database (Documents tab) to verify that all MU Investigators listed on the IF have filed an OIDF within the previous 12 months. (Note that the DRA's eCompliance access is limited such that the content of the MU Investigators' OIDFs cannot be viewed.) The DRA saves screenshots or prints screens as documentation of current OIDFs for all MU Investigators.

**Note:** Consistent with the [NSF Conflict of Interest Policies \(Chapter IX-Grantee Standards of current Proposal & Award Policy and Procedure Guide \(PAPPG\)\)](#) which define "Investigator" as an individual "at the organization," MU will not require reporting nor manage the conflicts of external Investigators on NSF-funded projects.

**Note:** The following statuses indicate that an Outside Interest Disclosure Form (OIDF) has been submitted to the COI Office: Submitted, Returned, Under Review, Complete. The only status that does not meet the requirement for proposal submission is New. "New" indicates that an individual has started completing the OIDF but has not finished and submitted it to the COI Office.

If an MU Investigator has not submitted an OIDF, the DRA should provide guidance to the MU Investigator to access [eCompliance](#) or alert the COI Office and SGCA. As the submission deadline approaches, the COI Office will work with the MU Investigator to submit an OIDF and keep the DRA and SGCA informed of progress or potential delays.

**Note: NSF proposals will not be submitted until it is confirmed that all MU Investigators have a current Outside Interest Disclosure Form (OIDF) on file.**

**Note:** Preliminary proposals (pre-proposals) utilize the NSF Proposal Cover Sheet and are thus submissions subject to the [Proposal Certifications](#) outlined therein. An Investigator Form is required for pre-proposal submissions, and **NSF pre-proposals will not be submitted until it is confirmed that all MU Investigators have a current Outside Interest Disclosure Form (OIDF) on file.**

The DRA submits as part of the proposal package the following: (1) a completed IF signed by the PI, and (2) screenshots or printed and scanned pages from eCompliance confirming that each MU Investigator has a current OIDF on file.

OSPA – At proposal, the SGCA:

- Verifies that the PI submitted an Investigator Form (IF) for the project.
- Reviews the documentation submitted by the DRA and/or verifies via the eCompliance database (Document tab) that all MU Investigators on the IF have filed an OIDF within the previous 12 months, retaining documentation for the OSPA proposal file. (Note that the SGCA's

eCompliance access is limited such that the content of OIDs cannot be viewed.) If an MU Investigator has not submitted an OI, the SGCA should alert the COI Office, who will work with the MU Investigator to submit an OI and keep the SGCA informed of the status of the request.

*COI Office* – Prior to proposal submission, the COI Office will, at the request of the SGCA or Department/Division, work with an MU Investigator to complete an OI and will keep OSPA informed of its status.

The COI Office fields questions from the PI and Department/Division relating to the COI policies, including questions regarding how to identify an “Investigator.”

## Responsibilities

Below is an outline of responsibilities as they relate to this process at proposal.

### *Principal Investigator:*

- Identify all MU Investigators named in the proposal by completing the Investigator Form (IF).

### *Departmental Research Administrator:*

- Work with the PI to complete the IF.
- Verify that all MU Investigators listed on the IF have filed an OI within the previous 12 months. If an MU Investigator does not have a current OI on file, the DRA should immediately alert COI Office staff and the SGCA.
- Submit to OSPA the IF and eCompliance OI documentation with the grant application and PSRS.

### *Office of Sponsored Programs Administration:*

- Review the IF for completeness and accuracy.
- Review the documentation submitted by the DRA verifying that all MU Investigators listed on the IF have filed a current OI. If an MU Investigator has not submitted an OI, the SGCA should immediately alert COI Office staff.

### *COI Office:*

- Field questions from the PI and Department/Division relating to the COI policies.
- Work with MU Investigators to complete an OI prior to proposal submission and keep Department/Division staff and/or OSPA informed of its status.

## SECTION II. AT AWARD

### Procedure

*PI* – The PI collaborates with the COI Office and the Conflict of Interest Committee (COIC) as needed during the COI review process and ensures that all MU Investigators complete the Conflict of Interest Training in [eCompliance](#).

OSPA – The SGCA notifies the COI Office via [eCompliance](#) (Projects tab) upon receiving a request for an Advance/Pre-Award Account from the PI and Department/Division or a Notice of Award. The SGCA creates a New Proposal and Award entry in eCompliance and will upload the project Investigator Form and Scope of Work from the original Proposal file to facilitate the COI review.

**Note:** COI review and approval are not required prior to submission of Just in Time (JIT) information. A request for JIT information provides early notice of possible intent to fund, however, a request for JIT information is not an award notification and does not provide certainty that a proposal will ultimately receive funding, therefore, COI review and approval will occur when the Notice of Award is received from the sponsor.

Upon award, the SGCA reviews the agreement and collects applicable approvals (e.g., PI, legal, IRB/ACUC) while the COI Office completes the COI review. Agreements requiring University signature can be executed during the COI review process; however, the award cannot be set up until the COI review is complete.

*COI Office* – The COI Office initiates the COI review upon notice of an impending award, working to ensure that the review is completed in a timely manner based on the project start date identified by OSPA in the eCompliance notification. The COI Office reviews the Outside Interest Disclosure Forms (OIDFs) for all Investigators on the project (as determined prior to proposal submission), submits for COIC review if needed, and confirms that all MU Investigators on the project have completed Conflict of Interest Training.

Upon receipt of a *continuation* notification, the COI Office works with the PI/DRA to confirm that the Investigator Form (IF) and Scope of Work (SOW) on file are complete and accurate for the anticipated continuation period. The COI Office sends a “Review/Update IF & SOW” notification by email and works with the PI/DRA as needed to complete the process. The COI Office notifies OSPA of any updates submitted.

For any identified FCOI, the COI Office staff works with the MU Investigator to create a management plan. If at any time during the project the University finds that it is unable to satisfactorily manage a conflict of interest, the COI Office will inform NSF's Office of General Counsel. The COI Office will keep OSPA informed of any impact on the project relevant to pre- and post-award procedures.

The COI Office notifies the SGCA, Post-Award Team, and DRA that all MU Investigators have completed Conflict of Interest Training and that either (1) there is no FCOI related to the project or (2) an FCOI management plan has been implemented.

OSPA - The SGCA maintains documentation of the COI Office/COIC approval in the OSPA file. The award can be set up upon receipt of the approval notification.

## Responsibilities

Below is an outline of responsibilities as they relate to this process at award.

*Principal Investigator:*

- Collaborate with the COI Office and COIC to expedite approval.
- Work with MU Investigators to ensure all complete Conflict of Interest Training.

*Office of Sponsored Programs Administration:*

- Notify COI Office via [eCompliance](#) upon notice of new or additional funding, attaching the project's Investigator Form and Scope of Work.
- Maintain COI Office/COIC approval documentation in the OSPA file.
- Hold award setup until notification of COI Office/COIC approval.

*COI Office:*

- Initiate COI review process upon notification of impending award.
- For continuation applications (including No Time Cost Extensions), confirm that the IF and SOW on file are complete and accurate for the anticipated continuation period.
- Facilitate management plan development when necessary.
- Ensure that all MU Investigators complete Conflict of Interest Training.
- Notify OSPA of COI Office/COIC approval.

### **SECTION III. DURING THE PROJECT**

#### **Procedure**

*P/MU Investigators* – All MU Investigators must report any new or changed outside interests by submitting an OIDF via [eCompliance](#) as new interests arise.

*DRA/OSPA* – The DRA and OSPA will work closely together for compliant and consistent post-award administration.

#### **Change in Investigators**

**Note:** Before the PI adds a new MU Investigator to an ongoing project, the MU Investigator must log on to [eCompliance](#) to file an Outside Interest Disclosure Form (OIDF) and complete Conflict of Interest Training and the COI Office must complete a COI review.

*PI* – The PI completes a revised Investigator Form (IF).

*DRA* – The DRA works with the PI to complete the revised IF. The DRA ensures that all MU Investigators, as defined by the regulation, have submitted an Outside Interest Disclosure Form (OIDF) via [eCompliance](#) in the previous 12 months. The DRA submits the revised IF to OSPA.

*OSPA* – The SGCA or Post-Award Team notifies the COI Office by email at [coi@missouri.edu](mailto:coi@missouri.edu) upon receiving notification of a change in investigator(s), whether by way of a revised IF or a request to submit a change request to NSF. If a revised IF is received from the PI/DRA, OSPA will submit the documentation in the notification email; otherwise, the COI Office will work with the PI/DRA directly, as described below, to determine the need for a revised IF.

*COI Office* – The COI Office works with the PI/DRA to determine appropriate changes to the IF on file for the project. The COI Office sends a "Review/Update IF & SOW" notification by email and works with the PI/DRA as needed to complete the process. The COI Office notifies OSPA of any updates

submitted.

The COI Office ensures that all new Investigators have met the relevant disclosure and training requirements. The COI Office sends the approval notification to the PI, DRA, SGCA, and Post- Award Team. The COI Office facilitates development of a management plan for identified FCOIs.

If at any time during the project the University finds that it is unable to satisfactorily manage a conflict of interest, the COI Office will inform NSF's Office of General Counsel.

## Responsibilities

Below is an outline of responsibilities as they relate to this process during the project.

### *Principal Investigator:*

- Work with the DRA to report any change in Investigators by way of a revised IF.
- Report any new or changed outside interests (all MU Investigators).

### *Departmental Research Administrator:*

- Work closely with the OSPA Post-Award Team for compliant and consistent post-award administration.
- Work with OSPA to notify the COI Office upon learning of a change in Investigators or outside interests.
- Work with the PI to complete and submit a revised IF upon any notice of a change in Investigators on a project.
- Await COI Office approval before processing appropriate payroll changes to the project.

### *Office of Sponsored Programs Administration:*

- Submit revised IFs to the COI Office by email at [coi@missouri.edu](mailto:coi@missouri.edu) upon receipt from the PI and/or Department/Division.
- Notify the COI Office upon learning of a change in Investigators or outside interests.

### *COI Office:*

- Ensure that all new MU Investigators on a project complete an OI DF and the Conflict of Interest Training.
- Notify OSPA of COI Office/COIC approval of any new MU Investigator on a project.
- Facilitate development of a management plan for identified FCOIs.
- Notify NSF's Office of General Counsel of any unmanageable conflict of interest by an awardee.

## Need Help?

Contact OSPA at [muresearchospa@missouri.edu](mailto:muresearchospa@missouri.edu) or (573)-882-7560.

## Related Topics

[Advance and Pre-award Accounts](#)

[Creation Date](#)

08/23/2012

**Latest Revision Date**

06/11/2019

**APPENDIX 1. FCOI QUICK REFERENCE GUIDE FOR DRAS**

(next page)

Office of Sponsored Program Administration  
115 Business Loop 70W | Columbia, MO 65211-  
0001 573-882-7560 | grantsdc@missouri.edu





# FCOI Quick Reference Guide for DRAs

For full procedures, refer to “Financial Conflict of Interest under the 2011 Revised PHS Regulation” and “Financial Conflict of Interest in NSF-Funded Research” in the *OSPA Sponsored Programs Procedure Guide*.

## **For each PHS\* proposal (including those for which MU is the subrecipient):**

\*Includes all sponsors having adopted the PHS FCOI Rule. Refer to the [Investigator Form](#) for more information.

### **At proposal, the DRA should:**

1. Work with the PI to complete the Investigator Form (IF), listing [all Investigators](#) (MU and non-MU).  
**Note:** All Senior/Key Personnel and OSCs on the R&R Senior/Key Person Profile form must be listed on the IF.
2. Verify that all MU Investigators listed on the IF have filed an ODF within the previous 12 months. If an MU Investigator does not have a current ODF on file, provide guidance to the MU Investigator to access [eCompliance](#) or alert the SGCA.
3. For any [subrecipient](#) Investigator, obtain a Subrecipient Commitment Form (SCF) or Letter of Intent (LOI) and confirm COI policy certification. If the subrecipient indicates that it does not have a compliant policy, work with your SGCA to contact the COI Office.
4. For any [non-subrecipient](#) external Investigator, work with your SGCA to contact the COI Office.
5. Submit to OSPA the following: (1) IF, (2) eCompliance ODF status screenshots, (3) SCF or LOI, if applicable.

**Proposals will not be submitted until it is confirmed that all MU Investigators have a current ODF on file and all non-MU Investigators have made appropriate disclosures/certifications.**

### **At award:**

- The SGCA will notify the COI Office upon receiving a Pre-Award Account request, Notice of Award, or any other indication of funding.
- All MU Investigators must complete eCompliance COI Training.
- Agreements requiring University signature can be executed during the COI review process; however, the award cannot be set up until the COI review is complete and OSPA received COI Office approval.

**The COI Office will ensure all requirements are met and then notify OSPA. Projects will not be awarded prior to COI Office approval, regardless of the sponsor’s awarded start date.**

### **During the project:**

- All Investigators must (1) prior to acquiring new outside interests or making changes to existing interests, submit an updated ODF, (2) report sponsored travel within 30 days, (3) disclose SFIs annually, and (4) complete COI Training at least every four years.

**Change in Investigators:** Before the PI adds a new Investigator to an ongoing project, the COI Office must complete a review to ensure compliance with all requirements. **The DRA should:**

- Work with the PI to complete and submit a revised IF upon any notice of a change in Investigators on a project.
- Await COI Office approval before processing appropriate payroll changes to the project.

## **For each NSF proposal (including those for which MU is the subrecipient):**

### **At proposal, the DRA should:**

1. Work with the PI to complete the Investigator Form (IF), listing all [MU Investigators](#).  
**Note:** External partners (e.g., non-MU co-PI, non-MU Collaborator) are not included in the definition of “Investigator” as promulgated in the [NSF Conflict of Interest Policies](#); therefore, [individual disclosures or institutional certifications from external partners are not required](#).
2. Verify that all MU Investigators listed on the IF have filed an ODF within the previous 12 months. If an MU Investigator does not have a current ODF on file, provide guidance to the MU Investigator to access [eCompliance](#) or alert the SGCA.
3. Submit to OSPA the following: (1) IF, (2) eCompliance ODF status screenshots.

**Proposals and pre-proposals will not be submitted until it is confirmed that all MU Investigators have a current ODF on file.**

### **At award:**

- The SGCA will notify the COI Office upon receiving a Pre-Award Account request, Notice of Award, or any other indication of funding.
- All MU Investigators must complete eCompliance COI Training.
- Agreements requiring University signature can be executed during the COI review process; however, the award cannot be set up until the COI review is complete and OSPA received COI Office approval.

**The COI Office will ensure all requirements are met and then notify OSPA. Projects will not be awarded prior to COI Office approval, regardless of the sponsor’s awarded start date.**

### **During the project:**

- All MU Investigators must (1) prior to acquiring new outside interests or making changes to existing interests submit an updated ODF, (2) disclose SFIs annually, and (3) complete COI Training at least every four years.

**Change in Investigators:** Before the PI adds a new Investigator to an ongoing project, the COI Office must complete a review to ensure compliance with all requirements. **The DRA should:**

- Work with the PI to complete and submit a revised IF upon any notice of a change in Investigators on a project.
- Await COI Office approval before processing appropriate payroll changes to the project.