

SPS Pre-Award	SPS Post-Award	SPS Contracting	Departmental Business Office
<p><i>SPS Pre-Award staff role is to assure the Proposal Worksheet is completed and provide guidance on the Financial Conflict of Interest question. Staff enter PI and Investigators information into the Proposal Driven Disclosure (PDD)</i></p>	<p><i>SPS Post-Award staff role is to assure that FCOI has been properly managed or eliminated prior to awarding or expending any funds for which a Significant Financial Interest has been disclosed.</i></p>	<p><i>SPS Contracting staff role is to coordinate with Post-Award to assure any limitations or special considerations are included in contracts or subcontracts.</i></p>	<p><i>Departmental Business Office staff role is to be aware of issues related to FCOI and assure verification that any FCOI is managed or eliminated when it occurs or is disclosed.</i></p>
<p>SPS Pre-Award responsibilities:</p> <ul style="list-style-type: none"> • Gather names of investigators from the PI • Identify any Subrecipients that do not have a compliant FCOI policy • Identify any consultants (or other outside participants) that should be included as investigators • Complete the relevant fields in Coeus for inclusion in the PDD • Trigger the record to be uploaded to the PDD by marking the appropriate field in Coeus • Ensure all outside investigators get added manually to the PDD • Verify all disclosures have been received prior to submission for all PHS and PHS-like sponsors • Update titles in the PDD as necessary • Not Fund records as appropriate • Add/remove investigators as necessary • Deactivate records as appropriate 	<p>SPS Post-Award responsibilities:</p> <ul style="list-style-type: none"> • When FCOI paperwork is complete, awards@purdue.edu is notified of the status change in PDD and then the Secretary notifies the appropriate Post-Award area • Verifies the information has been managed/eliminated by the Responsible Official (Voichita) • If there is a Subcontract, verify with FDP clearinghouse they have a FCOI policy <p><i>For Amendments and NTP's:</i></p> <ul style="list-style-type: none"> • Verifies with the PI, via email template, who the investigators are based on the proposal and if there are any changes (adding or taking off a PI) • Based upon PI response to the above, a new FCOI may be set up either with the new proposal number or with the original proposal number prefaced with NCE in front of it • Once the FCOI has been completed by the PI, Post-Award is notified by an auto-generated email sent to the generic email based on the area selected in the FCOI drop down • Amendment is processed if there is no FCOI or if the FCOI has been managed • Reviewer of the amendment then goes in and updates the dates and grant number to show the grant and dates the FCOI is valid on. 	<p>SPS Contracting responsibilities:</p> <ul style="list-style-type: none"> • During negotiations, if an issue of a potential FCOI is raised, refer the PI to Pre-Award for processing • During negotiations, evaluate contractual language regarding financial conflict of interest, including <ol style="list-style-type: none"> 1. whether certs and reps in proposal process should be signed, after ensuring Post-Award processes are complete; 2. whether university can comply with suggested contractual language; 3. for nonstandard language, referring to Asst. VP for Research Compliance for evaluation; and 4. ensuring federal financial conflict of interest language is flowed down to subs; and 5. elevating to supervisor to check for the presence of the PI's financial conflict of interest plan • Should a PI raise a compliance issue regarding financial conflict of interest, elevate to supervisor for possible eventual referral to Assistant VP for Research Compliance and to General Counsel 	<p>Departmental Business Office responsibilities:</p> <ul style="list-style-type: none"> • Assist SPS staff with their responsibilities related to FCOI, as requested • Validate list distributed by the Assistant Vice President for Research to be aware of staff with a managed FCOI and their associated company • Awareness of role related to activities where there are FCOI, such as procurement and receiving of gifts. • Recognize situations where there is a potential FCOI and ask additional questions, as needed. • Discuss with Department Head situations where the Business Office can assist with individuals having a FCOI and related management plan. • Ensure obtaining certification of allocability when procuring goods and services • If uncertain of potential FCOI, ask the right questions or elevate, as needed • Know who the resources are related to FCOI