



Office of the Vice Chancellor Of Research

Greetings,

President Choi has issued a directive requiring all Universities to comply with federal Financial Conflict of Interest (FCOI) regulations and UM [institutional policies](#). To ensure compliance, there will be changes to proposal submissions and award processes. We would like to address these changes and detail their impact on faculty.

1) **Disclosure Forms**: all investigators must submit an Outside Interest Disclosure Form (OIDF) in a new platform located at [eCompliance](#): (a) annually, and (b) within 30 days of discovering or acquiring (e.g., through purchase, marriage, or inheritance) a new significant financial interest. The Office of Sponsored Programs (OSP) will confirm that all investigators listed on a proposal have a current OIDF prior to submission.

2) **Federal Proposals**: for National Science Foundation (NSF) and Public Health Service (PHS) proposals, the Principal Investigator (PI) must take the additional step of completing an Investigator Form (IF) identifying the investigators who will work on the project. The PHS defines “investigator” very broadly; the investigator can be the project director or principal Investigator *and any other person, regardless of title or position*, who is responsible for the design, conduct, or reporting of funded research, which may include, for example, collaborators, consultants, staff members, and students engaging in post-doctoral research. See 42 C.F.R. § 50.603. The IF must be submitted in [eCompliance](#) before OSP will submit the proposal to the sponsor. A copy of the IF is attached.

When OSP receives notification of an award from NSF or PHS, the Conflict of Interest (COI) office at the University of Missouri, Columbia, will contact the PI by email to ensure the IF and scope of work have not changed. OSP will not issue a MOCode until it has received approval from the COI Office.

3) **COI Office**: the COI Office will work with the Missouri S&T Conflict of Interest Committee to ensure any conflicts of interest are managed. PIs will receive notifications from the Conflict of Interest Office whenever additional information is required or if a conflict management plan is needed.

4) **Training**: each PI is required to complete FCOI training prior to engaging in PHS-funded research and every four years afterwards. We use CITI (Collaborative Institutional Training Initiative) courses to comply with this



Office of the Vice Chancellor Of Research

requirement. When reviewing federal awards, the COI office will ensure that investigators listed on the IF have completed the required training.

Please note that the University of Missouri System's Collected Rules and Regulations provide that the Chancellor may apply sanctions as he/she feels appropriate for the failure to cooperate with or upon finding of a violation of COI policy. See CRR 330.015.

We recognize that complying with federal FCOI regulations is a complex process. We will be holding open forums to address the regulations, the impact on processes, and to address any questions or concerns.

Dates of Forums: January 29th, & February 7th, 2019

Location: Leach Theatre

Times: January 29th, Doors Open at 1pm, Forum begins at 1:30pm

February 7th, Doors Open at 1pm, Forum begins at 1:30pm

Sincerely,

Costas Tsatsoulis

Vice Chancellor of Research and Dean of Graduate Studies