

Procedures

During Proposal Review/Routing and Submission

1. As soon as it is determined a proposal for external fundi

3. PIs are responsible for completing COI training as required by PHS, NSF, the Dept of Energy, the State of California for private funding, and other sponsors

If the required training is not completed before submission, the PI must notify ORSP of when the training will be done and ensure completion.

All Cal State East Bay investigators are required to be compliant with FCOI training requirements prior to award acceptance.

4. Upon completion of training, CITI and Cayuse will sync and update records. For the CSU Learn CSU Ethic/COI training investigators may upload a copy of the training certificate upon completion to their Cayuse COI OI Profile. ORSP will also update training records on the Cayuse COI system monthly.
5. AVP ORSP or designee will review submissions of Conflict of Interest disclosures that disclose significant financial interests (SFIs) or other conflicts of interest and determine next steps, which often include FCOI Management Memos to document mitigation or management of perceived Conflict of Interests
6. Conflict of interest disclosures are also required from subaward teams

For any proposed subawards identified, a subrecipient commitment form is required that indicates whether the subrecipient PIs will follow their institution's or CSUEB's COI policy.

When pre-award staff are unsure whether a subrecipient's policy meets COI requirements, they may contact the ORSP Compliance Specialist, who can help confirm compliance.

If the subrecipient's policy does not comply with the training requirement, the pre-award staff will request subrecipient investigators complete CSUEB COI training. If this training is not completed before submission, the subrecipient PI must notify ORSP of when the training will be done and complete it as soon as possible prior. Lack of training certification will cause delays to the acceptance of a grant award.

During Award Negotiation and Acceptance

7. Prior to award acceptance, ORSP staff review award compliance including FCOI requirements and confirmation of training completion. If the training is not yet complete, award acceptance may be delayed

During PI Orientation and the Performance Period

8. During the award orientation meeting, post-award staff will review the training status again to confirm completion, and will review the completed Conflict of Interest forms with the PI to make sure they are current. Post award staff will also remind PIs to review FCOI policies (see ORSP policies website) with PI's and senior key personnel.

All project team

(A) The significant financial interest was disc

project of clinical research whose purpose is to evaluate the safety or e

