

Conflict of Interest Processing in HSC Sponsored Projects Office (SPO)

Background: The HSC SPO Staff used to spend upwards of 40% of their time collecting conflict of interest forms, ensuring all were completed and signed, and then forwarding to the COI Committee for review if necessary. In August, 2016, the HSC transitioned to Click ERA for both electronic processing of Conflict of Interest Forms and Grant/Contract initiation. This transition was intended to allow for transparency in the processing of contracts/grants/ancillary agreements and streamlining the conflict of interest process. This electronic transition means that SPO does not initiate, collect, maintain, forward, and check status of COI's in the same nature as it used to. The chart below will assist both SPO Staff and HSC Departments on who to contact in regards to Conflict of Interest statuses for COI's generated for all HSC Missions: <http://hsc.unm.edu/research/coi/about-coi/coi-committee-and-review-process/index.html>

<u>HSC Department Role</u>	<u>SPO Role</u>
<p>Click Grants allows for department staff to track the status of COI's related to the project through the COI Status Tab located on the Funding Proposal Workspace. The status's indicated will be able to guide the department on who they might need to follow up with. Status's include:</p> <p><u>Draft:</u> COI certification has not yet been completed</p> <p><u>No Review Required:</u> Required COI certifications have been completed and no potential conflicts has been identified</p> <p><u>Administrative Review:</u> COI certification has been completed and a potential COI identified</p> <p><u>Administrative Review - response pending:</u> The COI Office has one (1) or more questions that have to be answered by the discloser</p> <p><u>Disclosure Review of Plan:</u> The discloser has a COI requiring a management plan and the discloser needs to accept or appeal the plan</p> <p><u>Under Management/Mitigation Plan:</u> Person with COI has accepted the management plan</p> <p><u>Withdrawn:</u> Person is no longer on project or project was not funded</p>	<p><u>SPO runs a weekly status check on all projects in "Prepare for Award" State that have been outstanding for 5 business days or longer.</u></p> <ul style="list-style-type: none">• If the record shows the award is held up due to an outstanding, incomplete COI, then SPO will contact the department admin contact to inquire about when the COI might be completed.• If the COI is not completed within 5 business days of the inquiry, SPO Staff (with Associate Director approval) will evaluate the need to award and determine if those personnel will be temporarily removed from the project, causing their incomplete COI Certification to be withdrawn and allowing the award to move forward but not allowing this person(s) to charge <u>or work</u> on the project until a new COI cert has been initiated and completed.

<u>HSC Department Role cont.</u>	<u>SPO Role cont.</u>
<p><u>If a COI is listed as draft:</u></p> <ul style="list-style-type: none"> • Department person assisting with the grant paperwork would follow up with those personnel to ensure they complete their COI's. There has not been a change in this process as department personnel used to follow-up and collect the paper forms. • The person listed as "Admin Contact" in the FP will get a COI reminder notice, electronically from COI, every Friday (along with the person who needs to complete the COI) to assist them in their follow-up. • The department person also has access to see the COI status at any time as referenced above. 	<p><u>If the weekly award status check reports shows COI status in Administrative Review:</u></p> <ul style="list-style-type: none"> • SPO will contact the COI Office to get an estimated time of review completion and enter a comment in Click.
<p><u>If the COI Status shows Administrative Review:</u></p> <ul style="list-style-type: none"> • Department person can contact COI directly (HSC-COI@salud.unm.edu) to find out a timeline of when the review might be complete. • SPO does not have access to this information. 	<p><u>If the weekly award status check report shows the COI Status is in Disclosure Review Plan:</u></p> <ul style="list-style-type: none"> • SPO will contact the Department Admin Contact to inquire about the status of acceptance of plan and enter a comment in Click with an estimated award date based on department feedback.
<p><u>If the COI Status shows Disclosure Review of Plan:</u></p> <ul style="list-style-type: none"> • Department person would reach out to the person who shows this status with their COI to find out if they have accepted their plan. • An electronic notification from COI will be sent to the person under review. The electronic notification IS ONLY sent to the person who needs to accept the plan. • At this stage, it is with the department to take action. 	