



CSUEB Conflict of Interest Disclosure and Training Internal Procedures

June 22, 2018

1. After receipt of an “Intent to Submit” online form at the pre-award stage, ORSP pre-award staff will email new PI’s and Senior Key Personnel with instructions on how to complete the appropriate Conflict of Interest (COI) Training (CSU, NIH, NSF or any combination required). For current PI’s and Senior Key Personnel (if NSF, NIH, or required by sponsor), pre-award staff will verify if COI training is current and communicate the need to complete this if needed.

All CSUEB investigators are expected to be compliant with COI training requirements prior to proposal submission. If this training is not completed before submission, the PI must notify ORSP of when the training will be done and complete it at such time.

2. Upon completion of training, investigators must submit the certification to ORSP pre-award staff. Following this, pre-award staff will send a copy of the training certification to the Compliance Specialist, who will enter the completion date in FileMaker. In general, the COI training is valid for two years although some sponsors may have differing policies.
3. When a proposal routing form (PRF) is initiated by pre-award staff, the appropriate Conflict of Interest forms (700-U, NIH, or NSF) are also generated for the PI and senior key personnel (if NSF, NIH or required by sponsor) to complete and return prior to proposal submission. For any proposed subawards identified, a subrecipient commitment form should confirm whether the subrecipient PIs will follow their institution’s or CSUEB’s COI policy. Pre-award staff should send an inquiry to the Compliance Specialist, who can help verify that the subrecipient’s policy meets COI requirements. If it does not, 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 at such time.
4. If the proposal is awarded, post-award staff will verify the COI training completion date in FileMaker prior to the award orientation meeting. If the training date is missing or expired, post-award staff will send an email to the PI(s) and senior key personnel (copying the Compliance Specialist) requesting the COI training be completed prior to conducting any work on the award. During the award orientation meeting, post-award staff will obtain the completion of training certification and updated COI forms, as well as review campus COI policies (see ORSP policies website) with PI’s and senior key personnel.
5. On a quarterly basis, the Compliance Specialist will review the status and send reminders to the appropriate PIs and key personnel about completing COI training and COI forms (CA 700-U or sponsor-specific disclosure form) prior to the due date. A general reminder statement about the training, with relevant links, will also be included in the email message with the monthly financial reports sent to PIs.
6. In the event of an amendment to the award, pre-award staff will obtain updated COI forms from the PI and senior key personnel (if NSF, NIH or required by sponsor) if the modification includes additional funding, and follow up with the investigator(s) if training has not yet been completed. Post-award staff will obtain updated COI forms if the modification is related to other types of changes (e.g., no cost extensions), and follow up with the investigator(s) if training has not yet

been completed. CPO

7. Within 30 days of discovering or acquiring a new significant financial interest, the PI or any senior key personnel must inform the Compliance Specialist who will be then collect updated COI disclosure forms. The Specialist will follow up with the investigator(s) if training has not yet been completed.
8. At award closeout, post-award staff will collect COI forms from PIs and senior key personnel.

Please note that CSU COI training is done through Skillport via the Chancellor's Office. NSF, NIH and other federal agencies may have additional training requirements.