



Office of the Vice President for Research
Standard Operating Procedure

Process for Pre Submission Conflict of Interest Review
#1003
Effective Date: 11/30/2018

I. **Purpose**

The purpose of this Standard Operating Procedure (SOP) is to detail the process by which Pre Award Specialists (PAS) review Conflict of Interest (COI) disclosures, ensuring all investigators are following SLU's COI policy at time of submission. The SLU *Financial Conflict of Interest in Research Policy* requires submission of financial disclosures for all individuals involved in the design, conduct, or reporting of externally funded research. These disclosures must be collected prior to the submission of the grant application as in alignment with OVPR policy.

II. **Introduction**

For any sponsored project grant application, a Principal Investigator (PI) and any internal senior/key personnel must provide conflict of interest disclosure to the research administration system. Doing so ensures that the researcher is covered by SLU's *Financial Conflict of Interest in Research Policy*, which complies with the Department of Health and Human Services, "Objectivity in Research," 42 CFR Part 50 and "Responsible Prospective Contractors," 45 CFR Part 94.

III. **Procedure**

Once a grant application is initiated in SLU's research administration system, the PI is added to the system. Once the PI is added to the system, the PAS can verify if each internal senior/key

personnel are in the system. If a senior/key person does not have a record, the PI should contact that individual and request that s/he be added to the system. The PI should review the *Pre Submission reviews SOP* for a complete step by step process. The PI should check to see if other personnel that are named in the grant application. If a person will be involved in the design, conduct, or reporting of the project, that person needs to be listed in the personnel list. If a person is not listed in the personnel list, that person should contact the PI for more information on their role in the project, s/he should contact the PI for

