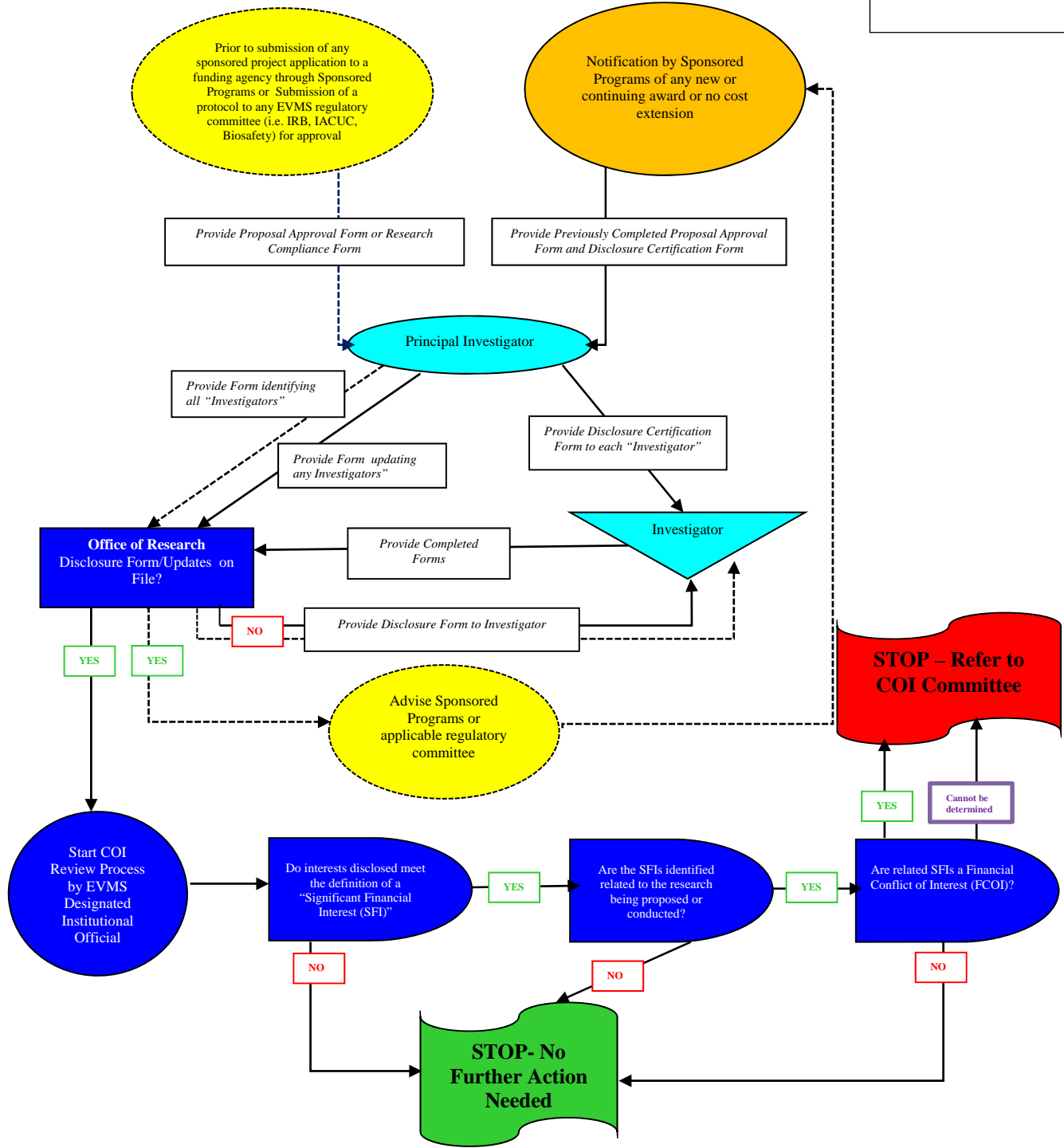
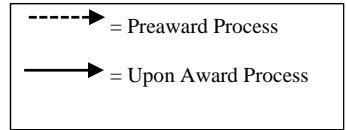


Conflicts of Interest Flowchart



PRE-AWARD

- At the time a research project is submitted to a regulatory committee for approval or prior to a grant application being submitted the PI shall be provided with a Proposal Approval Form or Research Compliance Form.
- The PI shall complete the form and identify all "Investigators" as defined by EVMS policy.
- The form should be signed by the applicable Chair and submitted to the office of research.
- The Office of Research shall ensure that a Disclosure Form is on file for each Investigator. If not, the Investigator will be sent a form to complete.
- Once all Investigators have completed a Disclosure Form, the Office of Sponsored Programs shall be notified and any pending grant application may be submitted.

NOTE THAT NO GRANT APPLICATION SHALL BE SUBMITTED UNTIL SUCH TIME AS DISCLOSURE FORMS BY INVESTIGATORS ARE RECEIVED.

UPON AWARD

- At the time of any new or continuing award or no cost extension, Sponsored Programs shall provide the PI with any previously Completed Proposal Approval Form and a Disclosure Certification Form.
- The PI shall review the Proposal Approval Form and add/change Investigators if applicable.
- PI shall provide a Disclosure Certification Form to each Investigator.
- The Office of Research shall ensure that a Disclosure Form is on file for each Investigator. If not, the Investigator will be sent a form to complete.
- Each Investigator Disclosure Form and any related updates will be reviewed to determine if:
 - The interests disclosed meet the definition of a Significant Financial Interest (SFI) as defined by the EVMS Policy on Conflicts of Interest;
 - Any SFIs identified are related to the research being proposed or conducted (for ongoing projects); and
 - If any related SFIs meet the definition of a Financial Conflict of Interest (FCOI) as defined by the EVMS Policy on Conflicts of Interest.
- If no FCOI exists, no further action is needed and the appropriate parties will be notified so that funding can be released.
- If a FCOI exists, or the DIO is unable to determine if an FCOI exists, it must be referred to the COI Committee for determination and/or management.

NOTE THAT NO RELEASE/EXPENDITURE OF FUNDS IS PERMITTED UNTIL SUCH TIME AS DISCLOSURES BY INVESTIGATORS ARE RECEIVED REVIEWED, AND, WHEN APPLICABLE, MANAGED.