

University of Kentucky COI Management Process for Investigators

Investigator discloses using COI-Smart:
Annually on March 1st
AND
Within 30 days of changing an SFI

Disclosure contents and sponsored projects are reviewed by a delegate (COI Administrator) in OSPA when either the disclosure or the investigator's research portfolio are modified.

Institution determines there is a conflict.

Investigator works with COI Administrator and ADR to create a COI Management Plan.
(ADR and Investigator signatures required.)

Research Conflict of Interest Committee (RCOIC) reviews during their monthly meeting. RCOIC Chair issues memo to investigator with terms of the plan and gives them 5 days to challenge.

VPR reviews and approves.
(VPR signature required.)

OSPA will release any funds held for COI issues and will inform the sponsor.

RCOIC informs college-level or ad hoc "local oversight committee" of the COI Management Plan.

- Ongoing Investigator responsibilities during life of management plan:**
- Investigator submits Annual Reports to local oversight committee.
(Investigator signature required.)
 - Investigator discloses all presentations/publications to local oversight committee to review in advance. All presentations/publications must contain a disclosure of the conflict of interest.
 - Investigator discloses using COI-Smart within 30 days of changing an SFI.
 - Investigator informs COI Administrator when new personnel join the project.

Local oversight committee reviews programmatic activities and contacts project personnel.
(Oversight Committee Chair signature required.)

Oversight committee submits report to RCOIC for review.

RCOIC reviews and approves.

Investigator submits Final Report to RCOIC after project ends.
(Investigator signature required.)

RCOIC reviews and approves Final Report and management of the project ends.
(RCOIC Chair signature required.)