On October 24, 2003, the Financial Disclosure grayed out area on the 300A and B forms (revised 02/2003) was removed. Revised 10/2003 - 300A and B forms **WILL NOT** be required for any proposal already in progress; but

- Any 300 A and B (revised 2/2003) received that does not have Coeus data entry completed by October 31, 2003 and
- If a grayed out (revised 2/2003) 300 A-B form is received after November 1, 2003

All investigators will be required to complete the Financial Disclosure Section on the 300B (revised 10/2003). The site GCC should work with the SPO assigned to the proposal to accomplish this task.

**NOTE:** All Coeus completed data entered into the institute proposal module will automatically have the Financial Disclosure loaded as “no conflict” status when the new Coeus conversion (3.8.1.3) takes place. Compliance will update the few proposals that currently have pending conflicts to be resolved.

Coeus institute proposal data entry Financial Disclosure procedures (November 2003-after the conversion):

*(SPS user permissions to this Coeus Module will be limited to Site GCCs, Site Supervisors and Site Manager, due to the confidential nature of the material.)*

To record the 300A/B (revised 10/2003) the following steps need to be competed (added to the institutional proposal data entry process):

**With the institute proposal open:**
From the Coeus menu bar Select Maintain>Financial Interest Disclosure

![Coeus menu bar with Financial Interest Disclosure highlighted](image-url)
The following disclosure search screen will appear. List each investigator on the proposal in the disclosure search screen. Click “Find”

Search result:

Please note “Item Key” since that should match the institute proposal you are working on. If that is not the case, backup a few steps.

From the Coeus tool bar select or use the drop down Edit menu to access the investigator’s record. Since you will be entering the Financial Disclosure information from 300A/B (revised October 2003), you will want to select the “ADD” option from the Edit drop down menu.
Disclosure View

NOTE: Grayed out area references the proposal information and can not be accessed from this module.

Prior to SPS data entry, reviewing the COI Disclosure Details-Disclosure accessible fields:

- Disclosure Type: Initial
- Reviewed by: PI
- Disclosure Status: Pending

Depending on the 300A-B (revised 10/2003) Financial Disclosure information, the Disclosure Detail screen will need to be updated based on the Certification tab answers. Update Certification scenarios are listed below.
Click on the “Certification” tab

Since this is new proposal (after October 31, 2003), the Certification screen answers are blank and will need to be completed per the 300A-B (revised 10/2003) Financial Disclosure information.
NO CONFLICT:
300A-B (revised 10/2003) Financial Disclosure questions:

[ ] No significant financial interests related to this proposal exist and there are no material changes to the information described in my annual disclosure.

If the above question box is checked, then Coeus certification for should be “yes” Yes

[ ] A financial conflict of interest related to this proposal exists and is disclosed on the Investigator’s Disclosure of Financial Interest which has been submitted separately to the ORSPA Conflict of Interest Coordinator. I understand that no funds can be expended if an award is made as a result of this proposal until all identified conflicts have been institutionally managed or eliminated.

If the above question box is NOT checked, then Coeus certification for should be “no” No
After the Certification Data entry is complete, Click **Ok** and you will return to the Disclosure tab which will need to be updated as follows for NO Conflict:

- **Disclosure Type:** Initial – **NO Change** (other choices: annual)
- **Reviewed by:** PI – **revised to ORSPA** (other choices: Review Committee)
- **Disclosure Status:** Pending – **revised to NO Conflict**

When data entry is complete on this screen, click “OK”

**FYI - Disclosure Status Choices:**

<table>
<thead>
<tr>
<th>Status</th>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>100</td>
<td>Pending</td>
</tr>
<tr>
<td>101</td>
<td>PI Reviewed</td>
</tr>
<tr>
<td>102</td>
<td>ORSPA-Review in Progress</td>
</tr>
<tr>
<td>103</td>
<td>Other Review in Progress</td>
</tr>
<tr>
<td>105</td>
<td>Referred to Compliance</td>
</tr>
<tr>
<td>200</td>
<td><strong>No Conflict</strong></td>
</tr>
<tr>
<td>201</td>
<td>Resolved</td>
</tr>
<tr>
<td>300</td>
<td>Unresolved</td>
</tr>
</tbody>
</table>

**NOTE:** Even though Site GCCs, Site Supervisors and Site Manager have access (add and see) to “Disclosure Details” this section is restricted to **the ORSPA Conflict of Interest Coordinator’s area only for data input.**
When all investigators for this proposal have been entered with positive results, the Financial Interest Disclosure data entry process is complete and no further action is required at this time.
CONFLICT:

300A (revised 10/2003) Financial Disclosure questions:

☐ No significant financial interests related to this proposal exist and there are no material changes to the information described in my annual disclosure.

If the above question box is NOT checked, then Coeus certification for **CO11** should be “no” ☐ No

☒ A financial conflict of interest related to this proposal exists and is disclosed on the Investigator’s Disclosure of Financial Interest which has been submitted separately to the ORSPA Conflict of Interest Coordinator. I understand that no funds can be expended if an award is made as a result of this proposal until all identified conflicts have been institutionally managed or eliminated.

If the above question box is checked, then Coeus certification for **CO12** should be “yes” ☐ Yes
After the Certification Data entry is complete, Click [Ok] and you will return to the Disclosure tab which will need to be updated to reflect there is a conflict.

**Disclosure Type:** Initial – **NO Change**  
**Reviewed by:** PI – revised to ORSPA  
**Disclosure Status:** Pending – revised to Referred to Compliance

When all investigators for the proposal have been entered with negative/positive combination results, the SPS Financial Interest Disclosure portion of data entry process is complete, but

1. Proposal “other” tab needs to report #4 (Proposal follow-up status) out as “incomplete with a notation in notepad “refer to compliance”.

   **INCOMPLETE Follow-up needed; reference notepad**

   When the disclosure is managed or resolved, compliance will update the proposal file.

2. A complete copy of the proposal file needs to be made and sent to the attention of the ORSPA Conflict of Interest Coordinator, as soon as possible.

**NOTE:** Even though Site GCCs, Site Supervisors and Site Manager have access (add and see) to “Disclosure Details” this section is restricted to the ORSPA Conflict of Interest Coordinator’s area only for data input.
3. The proposal files (compliance copy, site copy and SPO copy, if applicable) need to be marked “that there is a conflict of interest and no activation (pre, modification or full) can be processed until resolved or managed. The Coeus proposal summary –disclosure status report could also be used. See Exhibit 1.

4. If a proposal’s financial conflict is not resolved or managed prior to receiving an award, Coeus will not “release” the activation “hold” status and the following message will be received:

![Coeus Message]

5. An override of the “Hold” status caused by an unresolved or unmanaged disclosure is not permitted by Coeus and the feed to Advantage will not take place.

The message screen will also appear when a new investigator is added to project, during the award process and the certification was not entered into Coeus. To resolve the certification entry matter for new investigators:

1. The SPO will need to work with the investigator(s) to have a 300B Financial Disclosure processed (the SPO should already have a 300B to add the new investigator)
2. A note should be placed on the outside of the activation packet prior to giving to the Site GCC, so they are aware that a certification for the new investigator must be processed
3. The Coeus Notice of Award or Notice of Award Modification can be used for certification data entry. See Exhibit 1.
4. Step 2 is very important on Pre-awards since proposals do not fund pre-awards and all investigators will not have a certification on file.
A “Disclosure Status Activation Packet” is received by the Site GCC. Now what do I do?

1. Log onto Coeus
2. From the Coeus menu, select Maintain>Financial Interest Disclosure
3. Coeus Disclosure search screen will appear
4. Search for the investigator(s) you are trying to update. Hit Enter or click [Find]. Result screen will provide you a disclosure list of all Coeus proposals and awards for the investigator you listed in your search.
5. Disclosure search results list. Locate the correct proposal or award and highlight.
6. From the Coeus tool bar select or use the drop down Edit menu to access the investigator’s record. Since you will be entering the Financial Disclosure information from 300A/B (revised October 2003), you will want to select the “ADD” option from the Edit drop down menu.
What if the proposal or award is not associated with the investigator?

If that is the case, select the Coeus drop down Edit menu click on “add”.

The following “New Disclosure” window will appear. Use the radio buttons to indicate if a new proposal or new award is being established for the PI.

Do a search for the person/investigator and a search for the institute proposal or award. When you have located the correct item, click “OK” and the item will be added to the list.
Select Person Screen:

Select a Proposal Screen
Select an Award Screen

Select the correct result and click “OK”. You will see the following message for a proposal and a similar one for an award.

If this is correct, click “YES”, if not, click “NO” and start the selection process over.
If you selected “YES” the Coeus COI Disclosure Detail, Certification tab will appear and you will need to answer the two questions based on the 300B (revised 10/2003) information.

When you click “OK” you will be taken back to the Disclosure List screen and the new record you just added will be highlighted.
From the Coeus tool bar, select “EDIT” and update the Coeus COI Disclosure Detail, Disclosure tab.
How does some one look-up a disclosure if they do not have permission to access the Financial Interest Disclosure Module?

They can’t. They must coordinate with the Site GCC, Site Supervisor, Site Manager or Compliance office.

Is there an easier way to search for investigators names if I have a large numbers of investigators on a proposal or award?

Yes, from the Disclosure Search screen, if you move the bottom scroll bar to the right, you will see the following additional search categories:

You will see the following additional search categories:

The “Item Key” can reference the proposal number or the award number. If you enter the number in this location and then in the “Applies To” select either “Award or Institute Proposal” your search results will only locate that item and the investigators associated with it. (See the screen below)
From the search result screen, you will be able to “edit” and update the Certification and Disclosure information on the COI Disclosure Detail Screen.
EXHIBIT 1

<table>
<thead>
<tr>
<th>Proposal Number: 94020394</th>
<th>Account Number:</th>
</tr>
</thead>
</table>

**Arizona State University**
Proposal Summary - Disclosure Status

**Proposal Number:** 94020394  **Sequence:** 1  **Proposal Type:** New

**Activity Type:** Organized Research

**Sponsor:** 00532  Shell Solar Industries

**Title:** SSI 02002A Hot Spot Tests for Modules with Spelsberg and Procharger Junction Boxes

---

This proposal has financial interest disclosures associated with it which are in Pending or Incomplete status.

**Disclosures for this award**

<table>
<thead>
<tr>
<th>Disclosure Number</th>
<th>Investigator</th>
<th>Type</th>
<th>Status</th>
</tr>
</thead>
<tbody>
<tr>
<td>00600906405</td>
<td>Tamizhmani.Govindasamy</td>
<td>Initial</td>
<td>Pending</td>
</tr>
</tbody>
</table>

---

**Okay for release**

Signed ____________________________  Date ________

Follow-up date: ____________________________
## Arizona State University
Proposal Summary - Disclosure Status

### Proposal Number: 04/0203/04
Sequence: 1
Proposal Type: New

**Account Number:**
Sponsor Proposal Number:

**Activity Type:** Organized Research

**Sponsor:** 005332 Shell Solar Industries
**Title:** SSL 02002A Hot Spot Tests for Modules with Spelsberg and Procharger Junction Boxes

This proposal has financial interest disclosures associated with it which are in Pending or Incomplete status.

<table>
<thead>
<tr>
<th>Disclosure Number</th>
<th>Investigator</th>
<th>Type</th>
<th>Status</th>
</tr>
</thead>
<tbody>
<tr>
<td>000090340-0405</td>
<td>Tamizhmani.Govindasamy</td>
<td>Initial</td>
<td>Incomplete</td>
</tr>
</tbody>
</table>

Okay for release: ________________________
Signed: ________________________

Follow-up date: ________________________
Date: ________________________

Coes Status- Unresolved
Site data entry 300A-B form - October 2003

Arizona State University
Proposal Summary - Disclosure Status

Proposal Number: 04020304  Sequence: 1  Proposal Type: New
Account Number:  Sponsor Proposal Number:  
Activity Type: Organized Research
Sponsor: 005332  Shell Solar Industries
Title: SSI 020002A Hot Spot Tests for Modules with Spelsberg and Procharger Junction Boxes

This proposal has financial interest disclosures associated with it which are in Pending or Incomplete status.

Disclosures for this award

<table>
<thead>
<tr>
<th>Disclosure Number</th>
<th>Investigator</th>
<th>Type</th>
<th>Status</th>
<th>Date</th>
</tr>
</thead>
<tbody>
<tr>
<td>00000006405</td>
<td>Thanizhmani, Govindasamy</td>
<td>Initial</td>
<td>In Progress</td>
<td></td>
</tr>
</tbody>
</table>

Okay for release: [Signature]
Follow-up date: [Date]
Arizona State University

Notice of Award - Disclosure Status

Account Number: VVS0004  Award Number: 014224-001  Sequence: 1  Status: Hold
Modification No:
Sponsor Award No:
   Sponsor: 003025 Gallup-McKinley County Schools
   Title: The TECH Share Project

This award has financial interest disclosures associated with it which are in Pending or Incomplete status.

Disclosures for this award

<table>
<thead>
<tr>
<th>Disclosure Number</th>
<th>Investigator</th>
<th>Type</th>
<th>Status</th>
</tr>
</thead>
<tbody>
<tr>
<td>0000006-001</td>
<td>Kilroy, Kathryn A</td>
<td>Initial</td>
<td>Complete</td>
</tr>
<tr>
<td>0000006-002</td>
<td>Smith, David C</td>
<td>Initial</td>
<td>Pending</td>
</tr>
</tbody>
</table>

Okay for release ____________________________
Signed ____________________________ Date ____________

Follow-up date: ____________________________
Arizona State University
Award Modification - Disclosure Status

Account Number: VVS0004  Award Number: 014234-001  Sequence: 1  Status: Hold

Modification No:

Sponsor Award No:

  Sponsor: 003125 Gallup-McKinley County Schools
  Title: The TECH Share Project

This award has financial interest disclosures associated with it which are in Pending or Incomplete status.

<table>
<thead>
<tr>
<th>Disclosure Number</th>
<th>Investigator</th>
<th>Type</th>
<th>Status</th>
</tr>
</thead>
<tbody>
<tr>
<td>00000000401</td>
<td>Kilroy, Kathryn A</td>
<td>Initial</td>
<td>Complete</td>
</tr>
<tr>
<td>00000000402</td>
<td>Smith, David C</td>
<td>Initial</td>
<td>Pending</td>
</tr>
</tbody>
</table>

Okay for release

Signed

Date