Purpose
To define how AMT verifies awards which are subject to or have adopted the Public Health Service (PHS) Financial Conflict of Interest (FCOI) regulations. PHS is also known as Department of Health & Human Services (DHHS). All project investigators are required to complete an annual research certification; however, with PHS regulations must also complete FCOI training (online) and additional PHS Reporting Requirements. Depending on answers provided on the questionnaire, a PHS Financial Interest Worksheet with Disclosure Forms may need to be completed as well.

In addition, this job aid defines how PNT verifies subawards issued by ASU on awards subject to the PHS FCOI regulations. Subaward PHS FCOI Verification is required regardless of whether the sub-awardee is impacted by the current award activation.

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Verifying PHS FCOI Compliance for ASU Investigators
ERA has been designed to identify which sponsors are subject to PHS FCOI regulations. If the award is funded by one of these sponsors, Smart Form (SF) 7.0 Special Review will require the AMT GCO to “Update” the FCOI training status for each project personnel subject to a COI review.

EXAMPLE: For a sponsor subject to PHS FCOI regulations, “Update” will display.

For a sponsor not subject to PHS FCOI regulations, “Update” will not display.
In the event a notice of award states PHS FCOI regulations apply, but the "Update" option does not display for the sponsor as expected, notify ORIA via "Additional Information Requested – Notification" activity (selecting ORIA as recipient) from the award workspace, requesting the sponsor be added to the list with a copy of the award.

If “Update” is available, it will be required to verify each investigator listed under the COI Certification List has completed the required training.

**STEP 1: Accessing the PHS FCOI ORIA Training Dashboard**

There are 3 ways to access the PHS FCOI ORIA Training Dashboard:

**Option 1:**
Access the dashboard directly from SF 7.0 by selecting link, "To check the PHS COI, click here."

**Option 2:**
Navigate directly to [https://researchintegrity.asu.edu/trained](https://researchintegrity.asu.edu/trained)

**Option 3:**
Access the Research Integrity Website at [https://researchintegrity.asu.edu/](https://researchintegrity.asu.edu/), select the Conflicts of Interest menu item and click "COI training data". **Please note:** If an “Access Denied” message appears, make sure you are signed in under your ASUrite ID and password

**STEP 2: Searching the Training Dashboard**

Once you have successfully accessed the PHS FCOI ORIA Training Dashboard, the training records will be displayed.

**STEP 2.a: Access Search Bar**

To search the records, press “CTRL+F” to access the browser search bar. The search bar will display either in the upper left portion of the window or on the bottom depending on the browser being used. **PLEASE NOTE:** The search function does not work on first and last name together

**STEP 2.b: Verify COI training status for each Investigator**

Perform search for each investigator listed under the COI Certification List. If the search result returns a COI training record with a timestamp, the investigator has completed the training. If the search indicates "No Matches Found", the investigator has not yet completed the appropriate training.

Once you have verified the status of each investigator, return to ERA.

**STEP 3: Update the ERA award record.**

Update each investigator record on the COI Certification List as appropriate. Select the “Update” button, which will bring up a pop-up window for the COI training status, then select “Yes” or “No”.

**STEP 4: Review items that may impact successful activation of the Award**

- If a required record is not properly updated, an error message will populate, preventing completion of the “Activate” activity.
- The following COI statuses indicate the COI certification process is completed and
no further action is required:
  o No Review Required
  o Review Complete
  o Withdrawn

  Other COI statuses indicate the COI certification process is still outstanding and ORIA action will be required.

STEP 5: Understanding the impact COI issues have on the “Activate” activity in ERA

- For awards that have met all COI requirements, running the “Activate” activity will place the award and associated accounts in an “Active” state, assuming there are no other special review holds.
- If an investigator has not completed the required training, or if there is a COI certification outstanding, ERA will prevent the award from being activated. When the “Activate” activity is run, the award will be placed in an “Activation Hold” state. The award will automatically show in a report for ORIA that is reviewed daily. It is no longer necessary to notify ORIA directly.
- ORIA will make updates to outstanding compliance issues directly in ERA. ORIA will run the “Modify Compliance Info” activity to make the required updates. Once all holds have been resolved, this activity will activate the Award and associated accounts.

NOTE: In certain instances, ORIA will notify AMT that an investigator must be removed from the proposal/award. AMT is not authorized to remove an investigator from a project without approval, via an ERA Award Change Request, from the unit. Therefore, the activation can continue to be processed (if cleared) however the unit should be notified to initiate the process in removing the investigator. The following template below can be used for this notification.

Dear <RA NAME>,

During award setup, our office received notification from Dr. <Investigator’s Full Name> stating <HE/SHE> is no longer affiliated with the project under Award <ERA AWARD NUMBER>. I have attached documentation confirming this correspondence.

To remove Dr. <INVESTIGATOR’S LAST NAME> as an investigator on the project, please submit an Award Change Request in ERA. Please note that Dr. <INVESTIGATOR’S LAST NAME> will receive an Annual COI Disclosure notice until <HE/SHE> is either removed from the project or terminated as an active ASU employee. If approved, and investigator allocations will be impacted, please also submit an Award Change Request (IAC Modification Type).

Thank you for your attention to this request and please feel free to contact me if you have any questions.

Verifying PHS FCOI Compliance with ASU-Issued Subawards

STEP 1: Verify subaward institution compliance using the FDP Institutional Clearinghouse
• Access the FDP Institutional Clearinghouse at: https://thefdp.org/default/fcoi-clearinghouse/
• Follow the link to the List Institutions and Entities that have demonstrated compliance.
• Search by the institution’s name or primary DUNS Number.
• For awards that have met this requirement, proceed with the activation. If the institution does not appear on this list, continue with the next review step.

**STEP 2: Verify subaward institution compliance using ASU SharePoint**

• Verify the subaward institution has a PHS FCOI Certification Letter on file with ASU.
• Letters can be found in 2007 SharePoint ORSPA > Proposals and Negotiations > Reference Documents > SUBAWARDS > PHS FCOI Certification Letters.
• For awards that have met this requirement, proceed with the activation. If the institution does not appear on this list, continue with the next review step.

**STEP 3: Resolving subaward institutions with no documentation of compliance**

• If the subaward institution compliance cannot be verified, request PNT action
• Update the “Create Subaward” task comments with the following:
  *The sub-recipient has not demonstrated compliance with PHS FCOI. Please obtain the PHS FCOI Compliance Certification from the sub-recipient.*