ASU Knowledge Enterprise Development — ARIZONA STATE UNIVERSITY		
	PREPARED BY: Brent Saron	**APPROVED BY:** Kristy Macdonald
DOCUMENT TITLE: Guide for Designing and Managing External Solicitations with COI Safeguards	**DEPARTMENT:** Research Compliance	**EFFECTIVE DATE:** October 1, 2025

Purpose

Merit-based competition is at the core of the U.S. research enterprise. Arizona State University (ASU) is committed to a process that is fair, competitive, transparent, and thorough. This ensures that competitions are based on the intellectual merit of the proposals – free from personal relationships, undue influence, or unethical incentives.

When external proposals are solicited (e.g., for research funding, collaborative projects, or sponsored initiatives), ASU takes on the role of a sponsor. With that role comes responsibility: the process must be structured, transparent, and fair, especially for managing conflicts of interest (COI). This guide provides a framework to design competitions that protect both the institution and the applicants.

Scope

External competitions (e.g., RFP, LOI, Pre-Proposal, White Paper, CFP, etc.) are used to award one or more funding opportunities to ASU and/or external applicant parties. These competitions are typically conducted by ASU centers or institutes tasked with involving the ASU and/or public community in the conduct of center/institute project activities. The funding for these competitive awards comes from the prime sponsor (e.g. a federal agency). The ASU center/institute and the center/institute project(s) then awards that funding to the selected party(ies) for specific projects.

Definitions

Conflict of interest (COI) means a situation when a person has a financial interest, personal activity, or relationship that could – or could be perceived to – compromise their ability to act impartially and in the best interest of the project.

Responsibilities

Project Leadership (e.g., Principal Investigators, C-Suite, etc.)
- Developing solicitation materials consistent with, and in compliance with, prime sponsor requirements and expectations.
- Creating proposal scoring evaluation tools and defining scoring criteria.
- Identifying proposal evaluation team members.
- Screening evaluation team members for COI and managing proposal assignments.
- Managing the overall proposal evaluation and selection process.

KE Compliance Partners
- Providing impartial advisory and resource support services.

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Requirements

Managing external competitions requires a structured, transparent process. The steps below outline the key stages for doing so effectively.

Step 1: Define the Competition
- Purpose (funding projects, research partnerships, etc.)
- Eligibility (membership organizations, industry partners, nonprofits, etc.)
- Funding parameters (amount, allowable costs, project duration),
- Award type (contract, grant, fixed price, cost reimbursement, etc.)
- Soliciation structure (e.g., LOI stage → invited proposals, or open RFP)
- Set up a central repository for all related records – RFP, evaluator guide, proposals, evaluations, and related documents – with access limited to those in the review process.
- See "SAMPLE External Competition Solicitation" Attachment

Step 2: Publish Clear Guidelines in the Solicitation & Posting
- Include eligibility restrictions, review criteria, scoring rubric, and timelines.
- Specify how proposals will be reviewed and by whom (e.g., faculty committee, external experts).
- Clarify confidentiality expectations for reviewers.
- Post the competition publicly (e.g., InfoReady, ASU Bid Boards, etc.) to ensure all eligible organizations are aware of the opportunity. If limited to a defined group, share the solicitation broadly within that group rather than only with select contacts. KE Compliance Partners can review the solicitation and offer feedback prior to posting.

Note: It is a mandatory requirement for the solicitation to include evaluation criteria (e.g., guide to scoring). The criteria must be set while preparing the solicitation, which is later used by reviewers to assess proposals.

Step 3: Build a Review Panel
- Identify and confirm evaluators before solicitation release or by the time proposals are received, ensuring they disclose any real or potential COI. Changes to the reviewer team after proposal submission should occur only for conflicts or unforeseen emergencies.
- Evaluators can be ASU and non-ASU people with requisite knowledge/expertise. An appropriate mix, however, must be assembled for fairness. Teams must NOT have all ASU evaluators if ASU will be submitting proposals in response to the solicitation.
- Recruit reviewers to reflect diverse disciplines, backgrounds, and perspectives to reduce bias. Evaluation teams should have an odd number of reviewers if collective decision-making will occur, with three reviewers per response considered best practice. If reviewers are only providing raw, individual scores without making decisions as a group, an odd number of reviewers is not necessary. However, proposals should still receive three reviews whenever possible. Recruit additional reviewers as needed to maintain three reviews per proposal in cases of conflicts of interest or high submission volume.
- Require all reviewers to sign COI and confidentiality agreements.
- Consider bringing in external reviewers if internal reviewers are highly connected to applicants.
- Prior to review, provide a short orientation (live or written) covering scoring rubric, confidentiality, and COI expectations.

Step 4: Identify and Manage COI
What Counts as COI in External Competitions?
- Reviewer has a financial interest in the applicant organization.

- Reviewer is currently consulting for, or employed by, the applicant.
- Reviewer has a personal relationship (family, close friend, advisor/advisee).
- Reviewer's own project or lab could be affected by the outcome, or they are directly involved in the applicant's project or team.

Best Practices for Managing COI:

- Pre-Review – Collect signed COI disclosures before assigning proposals.
- During Review – Recuse conflicted reviewers from scoring and discussions of specific proposals.
- Documentation – Keep a COI log (who recused, for which proposals, and why).
- Maintain all solicitation, scoring, and COI documentation in accordance with ASU record retention policy.
- Transparency – State in competition materials that COI safeguards are in place.
- See "SAMPLE Reviewer COI Disclosure Form" Attachment

Note: As a general rule, for conflicts of interest, institute/center executive leadership and industry advisory board members may not submit or be included as personnel (PI, Co-PI, Investigator, or other senior/key role, etc.) on any proposals for institute/center projects. This includes being included in proposals as a subcontractor to the prime applicant. It's recommended to consult with KE compliance partners before making related decisions.

Step 5: Review and Decision-Making

- Prior to evaluators beginning review, evaluate submissions for completeness to solicitation requirements (covered all requirements, no. of pages, etc.), preferably completed by an individual who is not a listed evaluator.
- Use a scoring rubric with written justifications to minimize subjectivity.
- Hold review meetings with a neutral chair (not an evaluator) to enforce COI recusals.
- Maintain an audit trail: reviewer assignments, scores, recusals, decision memos.
- See "SAMPLE Evaluator's Guide & Proposal Scoring Sheet" Attachment

Step 6: Communicate Outcomes

- Notify applicants of results respectfully and in a timely manner.
- Provide brief feedback (aggregate comments or rubric summaries), if feasible.
- Do not share reviewer identities or deliberations.

References / Related Documents

ACD 204–08: Conflict of Interest
RSP 206: Objectivity in Research—Disclosure of Financial Interests and Management of Conflicts of Interest
PUR 300: Federal Procurement
ASU Office of General Counsel

Attachments

SAMPLE External Competition Solicitation
SAMPLE Evaluator's Guide & Proposal Scoring Sheet
SAMPLE Reviewer COI Disclosure Form

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SAMPLE External Competition Solicitation

1. **Solicitation Name**
   Titles tend to include the name of the related project and the year of the funding.

2. **Overview & Purpose**
   A clear statement of goals, priorities, and expected outcomes. This section should outline the technical and contractual requirements for completing the project, including deliverables, design parameters, budget guidelines, timelines, and delivery expectations.

3. **Eligibility**
   Who can apply (institutions, individuals, consortia).
   Any restrictions (discipline, geography, career stage, proposer qualifications).

4. **Funding Information & Award Details**
   Contract/agreement type (FFP, cost reimbursement, etc.).
   Award size / budget limits.
   Allowable costs.
   Duration of support.
   Expected number of awards.

5. **Submission Instructions**
   Required documents (LOI, concept paper, full proposal).
   Formatting and page limits.
   Deadlines for each stage.
   Instructions regarding marking of proposal proprietary information (see ABOR 6-909.10)

6. **Proposal Content**
   Project summary / abstract.
   Project description / technical approach.
   Key personnel and qualifications.
   Budget and justification.
   Facilities, resources, partnerships, and letters of support.

7. **Review Criteria**
   Scientific/technical merit or alignment with program goals; Feasibility and soundness of approach; Qualifications of PI/team; Cost effectiveness and resource use.

8. **Review Process**
   Who reviews (peer reviewers, panels, internal staff).
   Conflict of interest and confidentiality policies.
   Scoring, ranking, or selection methods.

9. **Award Administration**
   Terms and conditions of funding/contract, including any sponsor-required language.
   Reporting and compliance requirements.
   Post-award expectations (deliverables, data sharing, dissemination).

10. **Key Dates**
    Release date.
    Deadline due dates (LOI, proposal submission, Q&A period) – "Late proposals are not accepted."
    Review/award notification dates.
    Anticipated project start.

11. **Contact Information**
    Programmatic/scientific contact.
    Administrative/contractual contact.

SAMPLE Evaluator's Guide & Proposal Scoring Sheet

This guide is included as a mandatory resource for proposal reviewers and is purposed to ensure that best practices are followed when evaluating and scoring proposals.

Evaluator Guidelines:
- It is important that all evaluators read the solicitation, and any related amendments, before evaluating any proposals.
- Proposals must be reviewed and evaluated independently and not compared to one another.
- Do not meet with other evaluators to score proposals unless directed by the individual responsible for the process. Evaluators are selected to assess proposals independently, drawing on their own knowledge and experience.
- Evaluate solely on stated criteria and avoid assumptions unrelated to the solicitation.
- Proposals are not open records currently. Information contained in proposals evaluation results are confidential and are not to be shared with anyone outside the evaluation team.
- Do not share the evaluation results or the link to proposal information with anyone else. Use discretion when printing, saving, and storing the proposals.
- Evaluation comments may become open records after the award is awarded. Remember, keep comments professional and related to the applicable question.
- Do not include any proposal proprietary information (including proposed cost/budget information) in evaluation comments
- Ensure you comply with the evaluator Conflict of Interest (COI) Statement. Typically, a COI occurs when an evaluator, or evaluator's close family member (spouse or dependent children), has a financial interest in one of the companies or sub-contractors that is submitting a proposal in response to the solicitation. Notify the individual leading the evaluation process immediately if you feel you have a conflict of interest.

Sample Scoring Sheet

Criteria	Weight	Score Range	Reviewer Notes
Relevance to Goals	25%		
Innovation & Approach	25%		
Capability of Applicant	20%		
Feasibility & Budget	20%		
Broader Impact	10%		

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<u>SAMPLE COI Disclosure Form</u>

Purpose: To ensure fair and impartial review of proposals, reviewers must disclose any actual, potential, or perceived conflicts of interest.

Reviewer Information:
Reviewer Name: _____

Email: _____

Date: _____

Funding Opportunity / Solicitation: _____

Conflict-of-Interest Screening
Please check any that currently apply in relation to any potential applicant or proposal under this solicitation:

☐ I am a current or recent (past 12 months) collaborator, co-author, or co-investigator with a likely applicant or key personnel. If so, please explain:

_____

☐ I have a personal relationship (family, partner, close friendship) with a potential applicant or key personnel. If so, please explain:

_____

☐ I have a financial stake in any organization likely to apply. If so, please explain:

_____

☐ I am employed by, or negotiating employment with, an applicant organization. If so, please explain:

_____

☐ I have been a student, mentor, or supervisor of a potential PI or key personnel in the past 12 months. If so, please explain: _____

☐ Other (describe): _____

☐ None of the above apply at this time.

COI Certification
I certify that:
- I have disclosed all known actual, potential, or perceived conflicts.
- I will maintain confidentiality of all materials.
- I will recuse myself from reviewing proposals where a COI exists unless explicitly instructed otherwise.

Signature: _____   Date: _____