



Office of the Vice President for Research  
Standard Operating Procedure

Process for Pre-Submission Conflict of Interest Review

#1003

Effective Date: 11/30/2018

**I. Purpose**

The purpose of this Standard Operating Procedure (SOP) is to detail the process by which Pre-Award Specialists (PAS) review Conflict of Interest (COI) disclosures, ensuring all investigators are following SLU's COI policy at time of submission. The SLU *Financial Conflict of Interest in Research Policy* requires submission of financial disclosures for all individuals involved in the design, conduct, or reporting of externally funded research. These disclosures must be collected prior to the submission of the grant application as in alignment with OVPR policy.

**II. Introduction**

For any sponsored project grant application, a Principal Investigator (PI) and any internal senior/key personnel must provide conflict of interest disclosures, without exception. The PAS is responsible for ensuring this requirement is met by checking SLU's research administration system. Doing so ensures that the researcher is covered by SLU's *Financial Conflict of Interest in Research Policy*, which complies with the Department of Health and Human Services, "Objectivity in Research," 42 CFR Part 50 and "Responsible Prospective Contractors," 45 CFR Part 94.

**III. Procedure**

Once a grant application is initiated in SLU's research administration system, the PI is added to the personnel table in that newly created record. If other senior/key personnel are involved in the grant, each person must be added to the personnel table for that application. From the personnel table, the PAS can verify if each internal senior/key person has an updated COI disclosure on record. If a senior/key person does not have a current disclosure on record, the PAS will contact that individual and request that s/he complete a disclosure (see *COI pre-submission reviews SOP* for a complete step-by-step guide). Additionally, the PAS should check to see if other personnel that are named need to be added to the personnel table. If a person will be involved in the design, conduct, or reporting of the research, that person needs to be listed in the personnel table. If the PAS is unsure of a person's role in the project, s/he should contact the PI for

clarification. Should questions remain, the PAS should contact the COI Office at [coi@slu.edu](mailto:coi@slu.edu).

#### IV. Version History

Version Date	Approval Date	Summary Changes
[11/26/2018]	[11/30/2018]	Initial Version
[06/15/2021]	[06/17/2021]	Updated Procedure to reflect new process within SLU research administration system and correct SOP number