FINANCIAL CONFLICT OF INTEREST DISCLOSURE PROCESS MAP

**SLU PERSONNEL**
- Add all SLU personnel, regardless of compensation, to eRS transmittal form
  - All SLU personnel (except undergraduates) must complete COI disclosure

**NON-SLU PERSONNEL PAID BY SUBAWARD**
- Add all external personnel to transmittal form
  - Upload Letter of Intent to Establish Consortium (LOIEC) to transmittal form for all personnel paid by subaward

**NON-SLU PERSONNEL NOT COVERED BY SUBAWARD**
- Add all Non-SLU Senior Key personnel to transmittal form
  - Non-SLU Senior Key Personnel (regardless of pay) must provide a COI certification letter from home institution or complete Non-SLU disclosure form

**Other Listed Personnel**
- Add all other listed Non-SLU personnel regardless of pay to transmittal form
  - Are any of the other listed personnel responsible for design, conduct or reporting of Research?
    - Yes
      - All listed Non-SLU personnel (regardless of pay) must provide a COI certification letter from home institution or complete Non-SLU disclosure form
    - No
      - No further action required

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*Definitions and Clarifications*

**Senior Key Personnel** means the principal investigator, co-investigator, program director or any other persons who contribute to the scientific development or execution of a project in a substantive, measurable way.

**Other Listed Personnel** can include any other individuals who are listed on the project, regardless of compensation, including but not limited to investigator, other significant contributor, collaborator, consultant, research assistant or technician.