

April 24, 2023

Dear Research Campus Community,

RII implemented a process in February 2023 where OROI verified that COI disclosures for investigators were up to date at the time of proposal to meet federal regulations.

Over the last month, we have sought feedback from campus to understand the impact and streamline this process to reduce as much administrative burden on campus as possible.

As a result of that we are making a few changes that **don't result in any more actions** on the part of the researchers, however, clarify certain attestations and provide guidance. Here is a summary of changes that will go into effect April 24, 2023.

1. A new webpage "[Identifying Investigators & COI Disclosers](#)" has been created to provide guidance on who should be considered a COI discloser at time of proposal.
2. PI Attestation changes: This is part of the existing routing process and has been edited to clarify and make it easy to read.

Current:

Approval indicates that information in the online proposal and application is true, complete and accurate to the best of your knowledge. Approval confirms any cost sharing commitments, space arrangements, and resources for the proposed project. The PI, Co-PI, and others involved in the sponsored activity are not currently debarred, proposed for debarment, suspended, declared ineligible, or voluntarily excluded from transactions by a federal agency. If awarded, the PI, Co-PI, and lead unit agree to accept responsibility for the fiscal and scientific conduct of the project and provide progress reports as required by Federal or State Law, sponsor regulations, terms of the award, and university policy. The PI confirms this online proposal includes all identified Conflict of Interest investigators. The PI agrees to maintain a complete copy of the submitted proposal which may be accessed by Research, Innovation & Impact.

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The new version includes hyperlinks to the definition of an [Investigator](#) and the [Conflicts of Interest & Commitment Policy](#):

By clicking the Approve button...

- Approval indicates that the information included in this electronic proposal and the accompanying submission application is true, complete, and accurate to the best of your knowledge. Approval confirms any cost sharing commitments, space arrangements, and resources for the proposed project.
- The PI confirms this electronic proposal and the accompanying submission application include all "[Investigators](#)" as defined by and subject to the University of Arizona's [Conflicts of Interest & Commitment Policy](#).
- The PI, Co-PI(s), and others involved in the sponsored activity certify that they are not currently debarred, proposed for debarment, suspended, declared ineligible, or voluntarily excluded from transactions by a federal agency.
- If awarded, the PI, Co-PI(s), and Lead Unit agree to accept responsibility for the fiscal and scientific conduct of the project and provide progress reports as required by Federal or State law, sponsor regulations, terms of award, and University policy.
- The PI agrees to maintain a complete copy of the submitted proposal which may be accessed by Research, Innovation & Impact.

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3. Once the investigators have approved the proposal in UAccess research, Sponsored Projects will accept the COI disclosers identified by the PI as such and process the document. PIs may be contacted in case of other or related questions by Sponsored Projects.
4. The Questionnaire tab containing the question "Have all UArizona employees and DCCs who share the responsibility for of designing, conducting or reporting for the activity been added to the Personnel section of this online proposal?" **will no longer be included/required.**

I would like to thank our research community for their partnership in helping us be compliant and for communicating & working with us.

Thank you
Sangita Judge, PhD, MBA
VP, Operations, RII