

FCOI Disclosure by all Investigators on Grant Proposal Submission

Form Submitted to OSPA with Proposal Checklist

Disclosure Reviewed by Director of ORC or Designee

If "NO"
Conflict, ORC
Approves and
Retains
Disclosure

If "YES" on
Conflict, ORC
Contacts Dean
and Investigator
to Develop
Management Plan

If "YES" and Not Possible to Eliminate
Conflict, Disclosure Goes to
FCOI Committee

**FCOI Committee Reviews and Either Accepts
or Suggests Modifications to Further
Eliminate Conflict and Forwards to ORC
Director**

**Conflict of Interest Training Completed
by All Investigators Prior to Award**

ORC Director Sends to VCR for Approval

Disclosure Form Completed Annually

VCR Approves

**VCR Does Not
Approve Returns to
FCOI Committee or
Proposal Withdrawn**

Training Completed Every Four Years

Plan Filed and
Made Available to
Funding Agency -
Also Made
Accessible to Public
Upon Request

**Conflict of Interest
Training Completed
by All Investigators
Prior to Award**

Disclosure Form
Completed
Annually