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| PAF: | Sponsor PI: |

**NIH Annual Reporting:**

**Conflict of Interest Key Personnel Form**

**Required Form**: Please fill out the table(s) on the following page(s) accordingly regarding active, inactive and additional personnel on the project.

**Table 1: Investigators originally named in your PAF**

|  |  |  |  |
| --- | --- | --- | --- |
| Investigators shown on PAF as Key Personnel: (Not Mentors or Trainees for T32s) | Active | Inactive\* (Date) | Is Key Personnel? |
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*\*Note: If inactive, eRPM requires that an actual inactive date be entered into the system.*

**Table 2:**

**All additional personnel** who meet the updated definition of investigator who are now actively participating in the project (again, relative to the current reporting period)

|  |  |  |  |  |
| --- | --- | --- | --- | --- |
| New UM Investigators since PAF | Active Date | Is Key Personnel? | Participating Investigator | Non-Faculty Investigator |
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**Required Actions:**

* All investigators in Tables 1 & 2 must complete their COI disclosures in M-Inform prior to submission of the progress report.

*To access M-Inform, go to the* [*Wolverine Access*](http://wolverineaccess.umich.edu/) *> Faculty & Staff > M-Inform (Disclosure System).*

* **Electronic Submissions**:

1. Return this completed **form via eRPM** using the RPPR Review ‘activity’.
2. When you have completed the RPPR in eRA Commons**,** route the RPPR to the proper ORSP Specialist in Commons when returning this personnel form in eRPM.
   * + Note: ORSP *cannot*proceed with the progress report review and submission without this completed document.
     + If you have questions regarding this new process, please contact your Project Representative copied in this communication.

* *Note: Please* ***do not*** *upload a .pdf copy of the RPPR into eRPM with this form.* ***Return only this form in eRPM****. (Route the RPPR in Commons.)*

**Reference Information:**

NIH’s regulations regarding Financial Conflict of Interest went into effect on 8/24/2012.

The following websites are included here for your reference:

NIH: Responsibility of Applicants for Promoting Objectivity in Research for which PHS Funding is sought ([42 C.F.R. Part 50, Subpart F](http://ecfr.gpoaccess.gov/cgi/t/text/text-idx?c=ecfr&sid=f67ea01984581d3934103b5074c05500&rgn=div5&view=text&node=42:1.0.1.4.22&idno=42#42:1.0.1.4.22.6))

<http://grants.nih.gov/grants/policy/coi/>

ORSP: Understanding Conflict of Interest In Sponsored Research and Technology Transfer Agreements

<http://orsp.umich.edu/policies/um/coi/>

These regulations require that we collect more information at this time than we have in the past. The changes to eRPM as a result of the new regulations make it necessary to update the PAF at the time we process your progress report. One of the key points in the new regulation is the definition of Investigator, which is now defined as:  
  
The Principal Investigator (PI) or Project Director (PD), Participating Investigators, Senior/Key personnel (as identified by the institution in a proposal or sponsor report), and any other individual identified by the PI/PD as responsible for the design, conduct, or reporting of the research (i.e., not simply working on, or engaged in the project).

In Table 1 are the investigators originally named in your PAF. Please identify whether each is Active, or Inactive. \*Place a check mark in the Key Personnel column for individuals who are key to the research. ORSP will use this information to update the PAF. If you have indicated to the sponsor in the application that the investigator is key personnel, the investigator is key for this purpose as well.

In Table 2, identify all additional personnel who meet the updated definition of investigator who are now actively participating in the project (again, relative to the current reporting period). For each entry, please indicate the date the Investigator began work on the project and whether they are considered key to the research and their role.