**Guidance to BAs regarding PHS and PCORI funded Projects -** **Process to confirm FCOI Compliance in PHS-FITS at the time of the next Notice of Award after July 1, 2022**

**All**

**To ensure that each Investigator has met all requirements for FCOI compliance on an annual basis for PHS and PCORI-funded projects, the following procedure must be followed AT THE TIME OF THE NEXT NOA (or its equivalent) after 7/1/22**

**BA Responsibilities -** at the time of the next NOA**:**

1) Confirm Investigator list for that award with the PI.

2) In the PHS-FITS Investigator Maintenance module:

a) Enter an “End Date” for any Investigator who is no longer participating.

b) Add any Penn Investigators who were not previously listed, including non-Penn Investigators. Make sure each Investigator is assigned a role.

**To add non-Penn Investigators on a subaward who are covered under Penn’s FCOI Policy:**

1) Click Add Investigator (in green)

2) Click the box Non-Penn Investigator

3) Click Add Investigator (blue box)

4) Enter first name, last name, email address and Institution

5) For Role, select “Other” from the drop down list

**6)** **In the text box below, enter the Role as “Non Penn Investigator covered by Penn”**

7) Disclosure Type should be “Other”

8) Enter Start date

9) Click Save

**To add non-Penn Investigators who are not listed on a subaward but will be covered under Penn’s FCOI Policy:**

Repeat steps 1-5 above

6) For Role, select “Other” from the drop down list

**7) In the text box, enter the Role as “Consultant – No subaward -covered by Penn”**

8) Enter Start date

9) Click Save

3) Run a Financial/Travel Report on the award and confirm that each Penn Investigator has “Yes” for “FI/travel sub” and a “Last Rev Date” on or after 7/1/22.

4) Run a Grant Relatedness Status Report on the award and confirm that:

a) each Penn Investigator has a Relatedness Assessment for that award with a “Related status” of “FIDES required; school concurs" or "FIDES not required; school concurs" (regardless of the date submitted). Note - **Investigators do not need to update their Grant Relatedness Assessments *unless* they added a new SFI.**

b) each Penn Investigator has a date in the “FCOI Training” field that is on or after **7/1/19.**

c) For Non-Penn Investigators on subawards where the subrecipient has a compliant FCOI policy, the Relatedness Status should be “Not Submitted.”

d) For Non-Penn Investigators covered under Penn’s FCOI Policy (because the Subrecipient does not have a compliant policy or the individual is not covered under a subaward / subcontract), confirm:

* that the Relatedness Status is “Non PHS-FITS Disclosure Received.”
* receipt of an annual FCOI clearance email from the RIO for that year covering all such Investigators.

5) When all the above have been completed, certify the list of Investigators.

If you have any questions regarding the above, please email [phs@pobox.upenn.edu](mailto:phs@pobox.upenn.edu) or contact us by phone at 215-746-4775.

Thanks.