



Arecibo Observatory
Office of the Director

SUBJECT: Arecibo Observatory Conflict of Interest Training	Effective Date: 04-30-2020	Policy Number: AO-POGM02
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	Responsible Authority: Director of the Arecibo Observatory	

DATE OF INITIAL ADOPTION AND EFFECTIVE DATE: April 30, 2020

GENERAL INFORMATION

(Co-) Principal Investigators (PI), Postdoctoral Associates, and any others employees identified by the PI as responsible for the design, conduct, or reporting of research must disclose potential Conflicts of Interest (outside activities, interests, and commitments in outside entities) to University designated officials.

Investigators are required to complete an online COI course through the Collaborative Institutional Training Initiative (CITI) program prior to engaging in research and every 4 years thereafter.

PROCEDURES

The Office of Research Integrity Compliance will receive notification from Human Resources for new hires at Arecibo. Research Integrity Compliance staff will facilitate activation of conflict of interest disclosures based on the employee title and role related to research. Employees required to disclose will receive a notification email from PCA@ucf.edu requesting submission of their AA-21 form within 30 days. Employees must complete the disclosure form even if they do not have an outside activity, interest, or commitment.

Notifications to disclose will then be sent at the beginning of the next reporting period requesting submission of an annual disclosure for the current reporting period. The reporting period is from August 8th-August 7th each year. Employees will submit an AA-21 form through the Potential Outside Activity, Employment, and Conflict of Interest and Commitment Disclosure (AA-21) available in the ARGIS Conflict of Interest & Commitment System at <https://argis.research.ucf.edu/coi/>. After review is completed, amendments to AA-21 forms can be submitted throughout the disclosure period using the same link within 30 days of discovering, acquiring, or committing to a new financial interest. A link is provided in the email from PCA@ucf.edu.

Investigators will disclose interests related to research projects in Huron Grants and Huron IRB at time of proposal/protocol application.

Prior to engaging in research investigators will login to the UCF Learners CITI single-sign on portal at <http://citi.research.ucf.edu> using their NID and NID password to access the COI Basic Course modules (ID: 15070 and ID: 15072). CITI will generate notifications to the investigator's UCF email account every 4 years thereafter with a notification that training is expiring and COI Refresher Training is due.

Instructions for accessing CITI-COI Basic Course Modules:
http://www.coi.ucf.edu/Documents/COI_AccessingCITI_COI_Training.pdf

Employees Required to Disclose are responsible for disclosing their outside activities in accordance with UCF Policy 4.504.2-Reporting a Potential Conflict of Interest or Conflict of Commitment in Research and responding to notifications received from PCA@ucf.edu within designated timeframes.

Principal Investigators are responsible for identifying employees independently responsible for design, conduct, or reporting of research in each sponsored funding proposal.

Academic and Research Unit Leadership (FSI) is responsible for insuring personnel required to disclose have submitted their AA-21 form within the 30 day timeframe. Supervisors are notified via email from PCA@ucf.edu when their employee has submitted an AA-21 form. Supervisory review is requested within 15 days of receipt.

Office of Research is responsible for establishing accounts in ARGIS and activation of AA-21 forms as appropriate and reviewing disclosures in accordance with UCF Policy 4.504.2. The Office of Research will provide COI training modules and track compliance with COI training.

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University Compliance, Ethics, and Risk will track compliance with disclosure deadlines once the AA-21 form is activated by the Office of Research.

How is the COI reviewed?

Review of COI is conducted in the Potential Outside Activity, Employment, and Conflict of Interest and Commitment Disclosure (AA-21) system. All submissions are reviewed by the employee's direct supervisor. Forms may also be routed to the Office of Research and University Compliance, Ethics, and Risk based on information disclosed. Activities requiring monitoring plans related to sponsored research or technology transfer will be reviewed by other university officials outside the system. The Office of Research will coordinate correspondence related to monitoring plan reviews.

How is the COI training recorded?

CITI maintains a database of UCF Learner training records. The Office of Research Integrity Compliance staff receive notification of completed training and have administrative access to the records.

Additional information regarding Research COI can be found on the website: <http://www.coi.ucf.edu/>.

Responsible Conduct of Research Guidelines

GENERAL INFORMATION

Postdoctoral researchers, graduate, and undergraduate students on NSF sponsored research projects must complete an online RCR course through the Collaborative Institutional Training Initiative (CITI) program within 60 calendar days from the date assigned to the project payroll and every 3 years thereafter.

PROCEDURES

The Office of Research Integrity Compliance will receive notification from Human Resources for new hires at Arecibo. Research Integrity Compliance staff will contact the supervisor of any postdoctoral researchers or students to inquire about participation on NSF sponsored research. If the employee will be paid on NSF funded research, an email from RCR@ucf.edu will be sent with instructions for accessing CITI to complete the RCR module that best fits their science (i.e. Biomedical, Social and Behavioral, Physical Science, Humanities, Engineering, etc.).

Instructions for accessing CITI RCR Modules: <http://citi.research.ucf.edu>.
http://www.rcr.ucf.edu/CITI_RCR_Training_Instructions.pdf

Principal Investigators are responsible for ensuring their postdocs and students have completed training within the 60 day deadline. If training is not completed within the sixty-day time period, investigators will be required to remove participant account charges from the NSF project payroll and suspend the participant from working on the project. PI's should notify Office of Research if they add an existing employee to an NSF project in the role of student or postdoctoral researcher.

Academic and Research Unit Leadership (FSI) are responsible for facilitating the removal of account charges if training is not completed within the sixty-day time period.

Office of Research is responsible for providing RCR training modules and will track compliance with COI training once new hire on NSF project is identified.

How is the RCR training recorded?

CITI maintains a database of UCF Learner training records. The Office of Research Integrity Compliance staff receive notification of completed training and have administrative access to the records.

Additional information regarding RCR can be found on the website: <http://www.rcr.ucf.edu/>

INITIATING AUTHORITY

Director of the Arecibo Observatory

POLICY APPROVAL	
(For use by the Office of the Director)	
Policy Number: AO-POGM02 Arecibo Observatory Conflict of Interest Training	
Initiating Authority: _____	Date: _____
Principal Investigator: _____	Date: _____