COI-OAR FAQs

Q: I’m a grant manager, if my PI didn’t tell me which personnel on their grant proposal should be marked as an investigator, can I figure it out by the role they play on the grant? Is there guidance about which roles are investigators and which aren’t?

You should always ask the PI which personnel on their grant proposal should be marked as an investigator as, ultimately, it is the PI’s responsibility to identify other investigators on the project.

You can find additional information about who is considered an investigator under the PHS regulations in the Frequently Asked Questions posted on the NIH website (http://grants.nih.gov/grants/policy/coi/coi_faqs.htm#D). According to the NIH, investigators are any individual, regardless of title or position, who is responsible for the design, conduct, or reporting of research. Titles that indicate a role as an investigator include principal investigator and project director, but could include collaborators, consultant or Other Significant Contributors (NIH).

Q: Is the PI of an award always considered an investigator?

Yes. Investigators include any individual who is responsible for the design, conduct, or reporting of research. PI’s will always be responsible for the design, conduct, or reporting of research and therefore will always be considered an investigator.

Q: Are mentors considered investigators on fellowships (for students and postdocs) and other mentored awards?

A mentor is typically considered to be an investigator because the mentor is responsible for the design, conduct, or reporting of the research.

Q: The PI or investigator on a new application is not yet a Harvard employee, so (s)he doesn’t have access to Harvard’s systems, including GMAS and OAR. What do I do if they can’t submit a COI certification using OAR?

A: If the PI/investigator already has an HUID, but does not appear in GMAS, please contact your SPA pre-award rep. If they do not have an HUID, complete a “Person of Interest” (POI) form (http://iam.harvard.edu/files/iam/files/authorized-identity-request-form.pdf) for them and submit it to the Longwood ID Services office at idoffice@hsph.harvard.edu as soon as possible (do *NOT* use the email address on bottom of the POI form, as this will take longer to process).

On the Person of Interest (POI) form you need to:

1. Select the role of “Consultant” (although they may not be a consultant on the award, this POI role will allow their information to feed into GMAS and OAR).
2. Enter the date you are completing the form in the “Start date” field.
3. The End date on the form should be the day before the person’s actual employment start date, if you have a firm start date. Otherwise, enter an end date 12 months from the start date entered.

(See below for fields on form.)

Do not enter the proposal in GMAS until the person record (with HUID) appears in GMAS. This can take several days from the day you submit the person of interest form. You can check GMAS by clicking on the “People” link at the top and searching on the applicant’s name.

**Q:** **A consultant (or Other Significant Contributor) on my proposal has been designated as an investigator. They can’t access the OAR system; how do they submit a COI certification?**

If the consultant (or Other Significant Contributor) on your proposal has been designated as an investigator, and they cannot access the OAR system, complete the following steps:

- Complete a “person of interest” form to obtain a HUID. http://iam.harvard.edu/files/iam/files/sponsored-identity-request-form.pdf
- A HUID will be issued within 2-3 business days.
- Once he/she has an HUID, the individual will need to set up their login through the PIN system (http://www.pin.harvard.edu/).
- Once the individual’s PIN is created, he/she will be able to log into the OAR system and complete the research certification in OAR.

**Q:** **HMS is submitting a proposal with an investigator from another Harvard school or affiliated institution. I know HMS has different COI policies and procedures from the other schools. Should the investigator follow their own school/affiliated institutions process, or should they follow the HMS process and certify in OAR?**

If the investigator is from another Harvard school or an affiliated institution but listed as an investigator on a grant proposal submitted through HMS, the investigator must follow the HMS process. When the investigator is added to the research team in GMAS, an OAR certification will be automatically created and the investigator will receive an email notification to complete the certification and upload their
school or affiliated institution’s disclosure form. Alternatively, the investigator may give ARI permission to obtain a copy of their up-to-date disclosure from their school or institution on his/her behalf.

**Q: An HMS researcher will be an investigator on another Harvard school or affiliated institution’s award. Which school/affiliated institution’s process do they follow: HMS, or the school/affiliated institution where the proposal is being submitted? How will the HMS investigator be notified about how to certify, and will they use OAR or another system to do so?**

An HMS researcher listed as a member of the research team on a grant submitted through another Harvard school or affiliated institution’s award should follow the process for submission of the school or institution through which the grant is submitted. This means that the school or institution will reach out to the investigator and/or ARI to provide a copy of their disclosure.

**Q: I’m submitting a proposal with a subaward and the subrecipient is a small organization that doesn’t have a PHS compliant COI policy in place. The subaward PI is considered an investigator. How should we handle this at time of submission to be compliant with our policy?**

When you add an individual to the research team and answer the question “Is this person responsible for the design, conduct or reporting?”, answer “No” for subcontractor investigators.

HMS is responsible for ensuring that any sub-recipient’s institution affirms that the institution has a PHS compliant COI policy and will report any FCOIs identified to HMS in a timely manner. HMS will be responsible for reporting it to PHS prior to any spending on subaward (or prior to commencement of new investigator participation). If sub-recipient institution does not have a COI policy, HMS will provide a PHS compliant COI policy and related disclosure form for the sub-recipient institution to consider for adoption. Additionally, HMS ensures that the subawardee institution adopts a PHS Compliant Policy. ARI and SPA have incorporated language to reflect the process in subawards.

**Q: I’m submitting a system-to-system (S2S) application via GMAS and there’s a subaward on it. I need to mark the subrecipient PI as Key personnel in GMAS so they appear on the Senior/Key personnel form in the application. Do I also need to mark the sub PI as an investigator? When should they be marked in GMAS as an investigator and when should they not be marked as investigator?**

When you add an individual to the research team and answer the question “Is this person responsible for the design, conduct or reporting?”, answer “No” for subcontractor investigators. While they technically meet the definition, HMS has contracted with the subawardee institution to conduct the COI process for their investigators.
Q: My PI is out of town and hasn’t submitted a COI certification for his/her proposal, which is due soon. If the PI doesn’t certify before the proposal due date, can the proposal still be submitted? Who can I speak to for an exception to the policy?

The outside activity disclosure certification must be completed by proposal submission. If the PI is having difficulty completing their submission, he/she should contact ARI for assistance. Additionally, you can let your SPA contact know and they will alert ARI is well.

ARI can be reached at outside_activities@hms.harvard.edu or (617)432-1343.

Q: What if my PI has questions about the PHS definition of an investigator or who the designation of investigator should be applied to on his/her project? Is there someone they can contact?

Your PI can find additional information about the definition of an investigator under the PHS regulations in the Frequently Asked Questions posted on the NIH website (http://grants.nih.gov/grants/policy/coi/coi_faqs.htm#D). If your PI has further questions about the PHS definition of an investigator or who the designation of investigator should be applied to on his/her project he/she can contact ARI at outside_activities@hms.harvard.edu or (617)432-1343.

Q: My PI says he/she didn’t get a notification email from GMAS to certify in OAR. Is there a direct link to the OAR system I can send him/her?

Yes, the direct link to the OAR system is https://esupport.hms.harvard.edu/OAR. Once logged into the OAR system the investigator will be able to access their certification in their “My Inbox”. Additionally, your PI can contact ARI to confirm that the OAR system is up-to-date with the accurate email address. You may also request that the email notification be resent by contacting ARI.

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Q: I was initially marked as an investigator on a proposal but then determined not to be an investigator so my designation was changed from Yes to No. Why do I still get an email notification to do the OAR Certification the next day?

The OAR system is updated every 24 hours. There is occasionally, however, a lag depending on when work is done in one system and when the update is made. Once the update is processed you should no longer receive email notifications from the OAR system. If you are, please contact ARI and we will ensure that the email notifications stop immediately.
Q. THE OAR STILL SAYS “NEEDS REVIEW” IN GMAS BUT THE GRANT PROPOSAL IS DUE. WHAT SHOULD I DO?

The grant can be submitted if the OAR is in “needs review”. The OAR will be reviewed and cleared once the grant is funded.

Q. WHAT IF MY PI HAS NOTHING TO REPORT?

The PI is required to complete an OAR certification even if he/she has nothing to report.