

Outside Activity & Interest Reporting Approval (OAIR) Cheat Sheet

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HELPFUL LINKS	https://oir.harvard.edu		
POLICY:	SYSTEM:	PROCESS & FORMS:	
Federal PHS regulation	Harvard disclosure system	OAIR/fCOI Process	PHS+ sponsors
Harvard fCOI policy		Paper form	FDP Clearinghouse
Harvard Chan implementation		Paper training	

DEFINITION OF INVESTIGATOR
Investigator means “the project director or principal Investigator and any other person, regardless of title or position, who is responsible for the design, conduct, or reporting”. **Only the PI will default as an investigator in GMAS.** Beyond that, the **PI identifies investigators**. *Key personnel including sub PIs are not automatically investigators.*

Please use the investigator flag *only* if the individual meets the definition so as not to create additional administrative burden.

WHAT DO I DO?

PHS + Sponsors		Non PHS + Sponsors
Proposal Stage	Award Stage (At risk, new and competing renewals)	Proposal & Award Stage
<p>GMAS approval will show as “Done” if investigator has an updated report on file – approved to submit.</p> <p>GMAS approval will show as “Pending” if investigator does not have an updated report on file. OAIR will email investigator to report. Investigator must take action. Wait for “Done” status before submitting.</p> <p>-If <u>sub PI</u> is an investigator, check that institution is in the FDP Clearinghouse or has their own policy; if yes, do not need to add to the research team.</p> <p>-If <u>sub PI, consultant, or OSC</u> is an investigator and does not have their own policy, have the individual fill out and sign the paper form and send it to COI reviewer to file in OAIR. Add them to the research team. The approval can then be manually marked as “Done”.</p>	<p>When the research team is confirmed, OAIR approvals will generate or update in GMAS for the PI and any other named investigator.</p> <p>A research certification will generate in OAIR for all investigators and will require an action by the investigator as well as by the DIO. The approval will be marked as “Pending update” and then “Processing in OAIR” until it can move to “Done” and the award can be set up.</p> <p>-If <u>sub PI</u> is an investigator, check that institution is in the FDP Clearinghouse or has their own policy; if yes, do not need to add them to the research team.</p> <p>-If <u>sub PI, consultant or OSC</u> is an investigator and does not have their own policy, have the individual re-fill out the paper form and send to COI reviewer to file in OAIR and review if needed. Add them to the research team if not already. The approval can then be manually marked as “Done”.</p> <p>For Non-Competing Continuations: Check to see if the department has revised the research team to add an investigator and ensure the approvals are in “Done” status.</p>	<p>PI will default as investigator and approval will generate but will return a “done” status from OAIR.</p> <p>NO ACTION NEEDED.</p>

BILLING AGREEMENTS—Who is responsible for fCOI?
 The Prime Awardee is responsible for collection of Conflict of Interest assurances for individuals paid under a billing agreement who are responsible for the design, conduct or reporting of the research

- “billing agreements in”: We are not responsible
- “billing agreements out”: We are responsible and need to check fCOI. Contact the COI reviewer who will try to obtain the disclosure from their prime institution rather than having them disclose at Harvard.