



University Research Compliance

Oklahoma State University

www.research.okstate.edu

TITLE: Personnel Update in Sponsored Research Projects

DEPARTMENTAL POLICY NUMBER: COI-107

REVISION NUMBER: 1.0

POLICY DATE: 8/20/2026

A. PURPOSE

This policy establishes the requirements for researchers to promptly update project personnel information whenever there are changes to individuals participating in sponsored research projects. Timely notification ensures that all individuals responsible for the design, conduct, or reporting of research are appropriately identified, complete required Conflict of Interest (COI) disclosure and training, and comply with applicable federal regulations, sponsor requirements, and Oklahoma State University (OSU) policies.

B. SCOPE

This policy applies to all Principal Investigators (PIs), Co-Principal Investigators (Co-PIs), Senior/Key Personnel, researchers, faculty, staff, students, postdoctoral scholars, and other personnel also known as Covered Individuals, who participate in the design, conduct, or reporting of sponsored research administered by Oklahoma State University. This policy applies to all sponsored projects, regardless of funding source, unless sponsor requirements impose more restrictive provisions.

C. DEFINITIONS

Covered Individuals: an individual, regardless of title or position, who: **(A)** contributes substantially to the design, conduct, reporting, oversight, administration, scientific development, or execution of a proposed research project to be carried out with a research award from a federal or other extramural agency; and **(B)** is designated as a Covered Individual by the applicable federal research agency or sponsor.

The term generally includes principal investigators, co-investigators, key personnel, senior/key research personnel, project directors, and other individuals who have substantive responsibility for the scientific, technical, regulatory, compliance, or programmatic aspects of the project.

The term does not include individuals whose responsibilities are solely administrative, clerical, ministerial, or support-related and who do not directly contribute to the design, conduct, reporting, oversight, administration, scientific development, or execution of the research project. This exclusion includes, but is not limited to, Sponsored Programs personnel, University Research Compliance personnel, departmental administrative staff, fiscal or grants administration staff, human resources personnel, procurement personnel, and other university support staff whose involvement is limited to institutional administrative functions and



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who are not directly engaged in project-specific research activities or decision-making.

Principal Investigator (PI): The Senior or Key-personnel in a research project; project director (PI), co-principal investigator (Co-PI), project manager or any individual regardless of title that is functionally performing as a PI, Co-PI or project manager.

Project Personnel Update: Any addition, removal, replacement, or change in role of personnel participating in a sponsored research project after proposal submission and during the life of the project.

D. ROLES AND RESPONSIBILITIES

The Principal Investigator is responsible for:

- Ensuring project personnel information remains accurate throughout the life of the project.
- Notifying the Office of University Research Compliance (URC) and other applicable university offices of any changes to project personnel.
- Ensuring newly added personnel complete all required COI disclosures and required training before participating in the research, when required.
- Ensuring no individual subject to disclosure requirements participates in the project until applicable COI requirements have been satisfied.

Project personnel are responsible for:

- Completing required COI disclosures within required timeframes.
- Updating disclosures within fifteen (15) days of acquiring or discovering a new reportable interest.
- Completing required COI and other required training prior to participating in research.

The COI office is responsible for:

- Reviewing COI disclosures submitted by newly added project personnel.
- Determining whether additional review or a management plan is required.
- Coordinating with investigators regarding incomplete or missing disclosures.
- Communicating approval status when COI review is complete.
- Assigning or assisting with creating management plans when needed.

E. Policy

Project personnel listed on sponsored projects must remain current with requirements throughout the proposal submission and the life of the award. The Principal Investigator shall notify the appropriate university office whenever:

- Personnel are added to the project.
- Personnel are removed from the project.
- Responsibilities of existing personnel significantly change.



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- Personnel become responsible for the design, conduct, or reporting of research after the project has begun.

Newly added personnel who meet the definition of Senior/Key Personnel or otherwise participate in the design, conduct, or reporting of research must complete all required COI disclosures before participating in project activities, as required by university policy and sponsor regulations.

If review of a disclosure identifies a COI requiring management, the individual may not participate in activities requiring COI approval until the conflict has been reviewed and, when applicable, an approved Management Plan has been implemented.

Failure to timely report personnel changes or complete required COI requirements may delay project activities, proposal submissions, award acceptance, account establishment, or continued participation in the sponsored project.

F. Procedure

1. The Principal Investigator identifies a change in project personnel.
2. The Principal Investigator submits the required personnel update through OneAegis "Personnel Modification Form"
3. The COI office determines whether newly added personnel require a COI disclosure and training based on their role and responsibility in sponsored project.
4. Required personnel complete or update their COI disclosure and training.
5. The COI office reviews submitted disclosures.
6. If no conflict is identified, the individual is cleared for participation.
7. If a conflict requiring management is identified, an appropriate Management Plan shall be developed, reviewed, and approved before participation in applicable research activities.
8. Documentation of personnel changes and COI determinations shall be maintained in accordance with COI record retention requirements.

G. References

- Oklahoma State University Policy- 4-0130
- 42 CFR Part 50, Subpart F
- 2 CFR §200.112
- 2 CFR §300.112
- National Science Foundation (NSF) Proposal and Award Policies and Procedures Guide (PAPPG), current version
- National Institutes of Health (NIH) Financial Conflict of Interest Regulations
- CHIPs & Sciences Act

H. Revision History

Date	Revision Number	Description of Changes
8/20/2026	1.0	COIC Initial Approval