Overview:

Individuals listed on the Key Persons/Personnel screen, with few exceptions, are required to complete Certification in Kuali Coeus before a proposal may be routed for approval.

To allow Investigators and Key Personnel to complete the required Certification for a proposal, you must complete the steps below:

Procedure:

Adding NIH/PHS Investigators and Key Personnel

Create a new proposal by entering the required information on the General Info screen and any additional information the Investigators/Key Persons may require for certification [see: KC Minimum Requirements for Routing Quick Reference Card or the KC User Guide on kc.mit.edu].

1. From the left navigation menu, click the Key Personnel panel. This will open the Key Personnel subpanel, click on the Personnel link.

Figure 1 – Key Personnel Subpanel/ Personnel Link
Use the chart below for general guidance on who should be listed as Investigators/Key Persons and whether certification is required. MIT guidance and more detailed information on identifying PHS investigators may be found here at [http://coi.mit.edu/sponsor-specific-guidelines/national-institutes-health-nih/who-investigator](http://coi.mit.edu/sponsor-specific-guidelines/national-institutes-health-nih/who-investigator).

<table>
<thead>
<tr>
<th></th>
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</tr>
</thead>
<tbody>
<tr>
<td>Yes</td>
<td>Either</td>
<td>PI/Contact</td>
<td>PD/PI</td>
<td>Yes</td>
<td>An &quot;Investigator&quot; means the project director/principal investigator and any other person who is responsible for the design, conduct, or reporting of research or instructional activities.</td>
</tr>
<tr>
<td>Yes</td>
<td>Yes</td>
<td>PI/Multiple (MIT Employee)</td>
<td>PD/PI</td>
<td>Yes</td>
<td></td>
</tr>
<tr>
<td>No</td>
<td>Yes</td>
<td>PI/Multiple (Non MIT Employee, often Subaward Investigator)</td>
<td>PD/PI</td>
<td>No - Managed by Subaward Organization</td>
<td></td>
</tr>
<tr>
<td>Yes</td>
<td>No</td>
<td>Co-Investigator (MIT Employee)</td>
<td>Co-Investigator</td>
<td>Yes</td>
<td></td>
</tr>
<tr>
<td>Yes</td>
<td>N/A</td>
<td>Key Person</td>
<td>Other</td>
<td>Yes</td>
<td>Individuals who commit to contribute to the scientific development or execution of the project, and DO commit specified measurable effort (i.e., person months) to the project.</td>
</tr>
<tr>
<td>No</td>
<td>N/A</td>
<td>Key Person</td>
<td>Other</td>
<td>Yes (requires DLC to Sponsor Non MIT individual by obtaining an MIT Kerberos ID, which creates an entry in the employee search - see under “To Add Key Persons” below)</td>
<td></td>
</tr>
<tr>
<td>Either</td>
<td>N/A</td>
<td>Key Person</td>
<td>Other</td>
<td>No – this role does not meet qualifications of certification and disclosure requirements</td>
<td></td>
</tr>
<tr>
<td>No</td>
<td>N/A</td>
<td>Key Person</td>
<td>Other</td>
<td>No – this role does not meet qualifications of certification and disclosure requirements</td>
<td></td>
</tr>
</tbody>
</table>

Key Person Role:
- enter role on the project i.e., Senior PostDoc Associate, Research Scientist, etc.

Other Project Role Category:
- [Key Person Role as entered]
Table 1 – General Guidance

**Note:** If a Certification is required in KC (per these PHS rules), the person must **NOT** be entered into the proposal using the Non-Employee lookup. See pages 9 and 10 for more info.

2. Click the **Add Personnel** button.

3. The **Add Personnel** screen will display with the list of the available search criteria fields. To add an MIT Employee, enter the Individuals first name, last name, username, or email and click the **Continue...** button.

4. The **Add Personnel** window will now display the list of employees, Select the individual you want to add, and then click the **Continue...** button.
5. The **Add Personnel** window will now display a list of assigned roles with Principal Investigator selected as default. Select the correct role and click the **Add Person** button.

6. If you select Key Person, additional field “Role” will be required. Those **not given** an exempt role of either **Consultant,** **Other Significant Contributor** or **Subaward Investigator** must complete certification questions and disclose if responses indicate a conflict of interest.
7. Click the **arrow** next to the Name of the individual that was just added.

![Key Personnel Screen](image1)

*Figure 5 - Key Personnel Screen*

The **Details** tab displays the Full Name, User Names, and Proposal Person Role ID.

8. If the proposal should route to an additional unit for approval, click the **Unit Details** tab.

![Unit Details Tab](image2)

*Figure 6 – Unit Details Tab*

9. Click on **Lookup/Add Multiple Lines** link.

10. Enter the desired search criteria into the desired fields and click the **Search** button.
11. Select the desired unit you wish to add, and then select the **Return Value** button at the bottom of the screen.

![Figure 7 - Unit Lookup](image)

12. Once you have selected your unit, click the **return selected** button.

13. Click the **Details** tab to confirm Units for Routing. **If the proposal should route to an additional unit for approval,** follow the same steps as above.

14. To **remove a Unit from routing**, click the **delete** button in the **Actions** column for the given unit.
To add Key Persons (Multi/PI)

1. Click the **Add Personnel** button.

   ![Figure 8 - Unit Details](image)

   **Figure 8 - Unit Details**

2. The **Add Personnel** screen will display with the list of the available search criteria fields. To add an **MIT Employee**, enter the Individuals first name, last name, username, or email and click the **Continue...** button. To add a **Non MIT person** select the Non-Employee radio button and enter the Individuals first name, last name, username and click the **Continue...** button.

3. The **Add Personnel** window will now display the list of employees, Select the individual you want to add, and then click the **Continue...** button.

   ![Figure 9- Add Personnel Button](image)

   **Figure 9- Add Personnel Button**
4. The Add Personnel window will now display a list of roles available to be assigned. Select the PI/Multiple option and click the Add Person button.

5. Continue adding personnel.

   Note: Unit Detail information must be added for Non MIT, PI/Multiple -use “999999”.

Note: If you are unable to find a non MIT employee person, please submit a Request a New Address Book Entry/Non-MIT Employee on-line Form, found here http://kc.mit.edu/forms
To add Non-MIT Key Persons

**Note:** Adding Key Persons to a proposal requires the additional field of "**Key Person Role**" to be entered. When that Key Person Role for a non-MIT Key Person is not exempt from certification (i.e. Consultant, Other Significant Contributor or Subaward Investigator) stop. You will need to get that person an MIT Kerberos ID through IS&T through their online system (ist.mit.edu, select “MIT Affiliate in Directory” Option). Requests can take a full business day before being processed. You will then use the Employee Search to add them to the proposal (see page 3 for instructions).

1. While in the **Personnel** subpanel, click the **Add Personnel** button. An **Add Personnel** window will open.

2. In the **Add Personnel** window, in the **Search for** section, select the **Non Employee** radio button.

3. Enter the search criteria for the Non-MIT person and click the **Continue** button.

4. Select the **Non-MIT Person** from the search results by clicking the **radio button** next to the Full Name and click the **Continue** button.
5. In the **Assign a role** window, select the radio button next to the role you want to assign. In the case of adding Subaward Investigator, you should select the **Key Person** radio button, enter **Subaward Investigator** in the ‘Key Person’s role will be’ field, and click the **Add Person** button.

![Assign a role](image)

Figure 14 – Assigning Role

The selected individual is added to the **Key Personnel** screen with six tabs across the top (**Details**, **Organization**, **Extended Details**, **Degrees**, **Unit Details**, and **Person Training Details**) that displays the additional information about the individual.

6. Click the **Save** button.

**Note:** *Subaward Investigators* are **not** required to certify the proposal nor do they have to complete the COI disclosure (that is managed by the Subaward Organization) therefore you will not see the Proposal Certification Questions tab appear when the Subaward Investigator are added to the proposal. Also, **Consultants** and **Other Significant Contributors** are not required to certify or disclose.

**Note:** For two or more Key Persons, use the **Up** and **Down** arrows to sort. KC will print the names listed on the forms in the order in which they appear on this panel.
Send Certification Request/Notify

MIT policy requires that all Principal Investigators and Co-investigators disclose potential financial conflicts of interest when submitting proposals. Kuali Coeus supports this requirement through the PI Certification process during which PIs and Co-Is complete the conflict of interest screening questions and, if required, complete a full disclosure.

PHS (Public Health Service) sponsors, including NIH, have adopted COI regulations that extend to Investigators and Key Persons requiring completion of Certification prior to submission of a proposal to route for approval and annual disclosure if awarded.

For more information, see the MIT Financial Conflict of Interest website at: http://coi.mit.edu/research/help-and-training/quick-reference-cards.

The PI and Co-I(s) listed in your proposal **MUST** complete the self-certification in KC before the proposal may be routed for approval (NIH and other PHS sponsors also require Key Study Persons to Certify – see exempt key person roles in NOTE on previous page). Certification questions include COI screening questions. If an investigator responds **YES** to one or more of the COI questions, they will be directed to complete a full Proposal Disclosure.

**Note:** Good practice is to send the certification request early in the proposal preparation process to ensure that all Investigators have sufficient time to complete the certification.

**To send Certification Request/Notify:**

1. While in the **Key Personnel** screen, click the **Notify All** button, to send an email notification to one or all Investigators regarding required certification. (You can also click the individual **Notify ____** buttons located next to each individual’s name.)

![Figure 15 – Notify All or Notify Specific Individual](image)

2. The **Notify All** window will open. Select the individuals to whom you want to send the Certification Notification to, by selecting the appropriate **checkbox** next to the person’s name, and then click the **Notify** button.
3. You may repeat the notification process to send repeated reminders to the Investigator(s). You will see a timestamp for the last time each individual was notified via email.

![Notify All Window](image)

**Note:** Investigators selected for notification will receive an email requesting they complete the certification for the proposal. The email contains a direct link to certify the proposal in KC. Once they have been notified, the Last Notification will be updated.

![Updated Last Notification](image)

Additionally, PIs will receive an email similar to the example below:

![PI Email Notification](image)
Based on answers to the certification questions, Investigators and PHS Key Persons may be directed to complete a required full COI disclosure in My COI. Their certification disclosure status will also change, as indicated in the table below:

<table>
<thead>
<tr>
<th>COI Disclosure Status</th>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>Not Disclosed</td>
<td>Person has not completed or submitted a Proposal Disclosure or are not required to certify/disclose</td>
</tr>
<tr>
<td>Review in Progress</td>
<td>Person has completed/submitted a proposal disclosure.</td>
</tr>
<tr>
<td>COI External</td>
<td>Person is not an MIT employee (e.g., consultant or Subaward Investigator) and COI is managed externally.</td>
</tr>
<tr>
<td>Disclosure Not Required</td>
<td>Person did not indicate any Potential conflict of interest in the COI screening questions and is therefore not required to certify.</td>
</tr>
</tbody>
</table>

Table 2-COI Disclosure Status

If a disclosure is required, it must be complete prior to submitting proposal for approval. Return to Key Personnel screen, COI Disclosure Status window to monitor progress.

Getting Help:

Your OSP Contract Administrator
Proposal preparation and routing and approval questions Applicability of new COI regulations

Conflict of Interest Officer
COI-help@mit.edu
Questions about the Conflict of Interest Policy

FCOI website and resources:
FCOI website http://coi.mit.edu
New PHS Regulations and to whom they apply http://coi.mit.edu/sponsor-specific-guidelines/national-institutes-health-nih

MIT IS&T to Request Kerberos ID
accounts@mit.edu
Phone: 617.253.1325

Kuali Coeus Support Team
kc-help@mit.edu
KC system issues and authorizations
Include your Name, Contact information, and the Proposal Number of the proposal you are working on.