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.

<table>
<thead>
<tr>
<th></th>
<th></th>
<th></th>
<th></th>
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<th></th>
</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>No - Managed by Subaward Organization</td>
<td></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]

Other Project Role Category: Other Significant Contributor

Other Project Role Category: Consultant

Office of the Vice President for Research Administration Services

QC PD 7-27-17 V3 Adding PHS Investigators Key Person Certification for Proposals
Table 1 – General Guidance

\textbf{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.

![Figure 5 - Key Personnel Screen](image)

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.

![Figure 6 – Unit Details Tab](image)

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.
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.

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 10 – Add Personnel Window

**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](http://kc.mit.edu/forms).

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”. 
To add Non-MIT Key Persons

**Note:** Adding Key Persons to a proposal requires the additional field of “Key Person Role” 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.

![Add Personnel Window](image)

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.

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 Certification 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.)

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.

![Figure 16 – Notify All Window](image1.png)

\textbf{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 \textbf{Last Notification} will be updated.

![Figure 17 - Updated Last Notification](image2.png)

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

![Figure 18 - PI Email Notification](image3.png)

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 2-COI Disclosure Status

<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>

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 RAS 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](http://coi.mit.edu)

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

**Research Administration Education & Support Team**
ra-help@mit.edu
For questions or problems using this Kuali Quick Reference Card or the procedure it describes, please email the Research Administration Education & Support team at Include your Name, Contact Information, and the Proposal, Award, or IP Number.