

COMPLIANCE-RELATED REQUIREMENTS AT TRANSACTION POINTS FOR SPONSORED PROJECT PERSONNEL

UPDATED 29 MAY 2019

OVERVIEW

There are a number of federal, state, University of Wisconsin System, and University of Wisconsin-Milwaukee regulations and policies that govern extramurally-funded projects and programs on campus. These regulations and policies include:

- [2 CFR 200 \(Uniform Guidance\)](#)
- [Wisconsin State Statute 35.93, UW System Chapter 8: Unclassified Code of Ethics](#)
- [Wisconsin State Statute 946.13, Private Interest in Public Contracts](#)
- [University of Wisconsin-Milwaukee Policy on Effort, Commitments, and Effort Certification](#)
- [National Science Foundation Award & Administration Guide, Chapter IV—Grantee Standards: Conflict of Interest \(COI\) Policies](#)
- [Public Health Service \(PHS\)¹ Financial Conflict of Interest \(FCOI\) Policy](#)

To help the research community comply with these regulations and policies, the chart below identifies the various compliance-related tasks required by project personnel for proposal submissions, award set-up, non-competing continuations, and no-cost extensions.

	PROPOSAL	AWARD	CONTINUATIONS	No-COST EXTENSIONS
Effort	NONE	Effort Tasks Complete Training Complete	NONE	NONE
<i>Which Personnel are Subject to the Effort Requirements?</i>	N/A	PI Co-PIs Co-Is Notice of Grant Award (NoGA) Personnel	N/A	N/A
COI	OAR on File	OAR on File	OAR on File	OAR on File
<i>Which Personnel are Subject to the COI Requirements?</i>	PI Co-PIs Co-Is Senior/Key Persons	PI Co-PIs Co-Is Senior/Key Persons NoGA Personnel	PI Co-PIs Co-Is Senior/Key Persons NoGA Personnel	PI Co-PIs Co-Is Senior/Key Persons NoGA Personnel
PHS FCOI	SFID on File	SFID on File FCOI Training Complete	SFID on File FCOI Training Complete	SFID on File FCOI Training Complete
<i>Which Personnel are Subject to the PHS FCOI Requirements?</i>	PI Co-PIs Co-Is Senior/Key Persons	PI Co-PIs Co-Is Senior/Key Persons NoGA Personnel	PI Co-PIs Co-Is Senior/Key Persons NoGA Personnel	PI Co-PIs Co-Is Senior/Key Persons NoGA Personnel

¹ "PHS" refers to PHS agencies that have adopted the PHS FCOI regulations. This requirement is applicable only to these agencies. A list of current federal agencies that ascribe to the PHS FCOI regulations is available at <http://thefdp.org/default/fcoi-clearinghouse/fcoi-agencies/>.