Office of the Dean Research and Graduate Education

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January 25, 2012

To: SOM Chairs

SOM Department Directors and Administrators

SOM Division Administrators

From: Kathy Bracy, Office of Research and Graduate Education

Re: New and Improved Routing for Significant Financial Interest Disclosures

(GIM 10 Forms)

UW Grants Information Memoranda (GIM 10) requires that key personnel engaged in research must disclose any significant financial interests (SFI's) associated with the proposed research, in advance of the submission of such proposals (please see

http://www.washington.edu/research/osp/gim/gim10.html). The Office of Research has authorized the School of Medicine to route GIM 10 forms electronically, as scanned PDF's, where feasible. The School will require electronic routing of all GIM 10 forms effective February 1.
2012. Electronic routing can commence immediately. Investigators have the option of also attaching their disclosure description electronically, or continuing to route this in a sealed envelope.

Process for SFI forms routing as part of a proposal submission:

- The GIM-10 forms associated with an actively routing eGC1 must be attached as a pdf document to the appropriate eGC1.
- The GIM-10 pdf must contain signatures of the Disclosing Person and his/her Chair before routing to the SOM Grant Review Unit for review with the complete proposal. Digital signatures are accepted.
- The SOM Grant Review Unit will print and sign each GIM-10 pdf, then upload the updated pdf's to the eGC1 as part of the School's eGC1 approval process. Missing, unsigned or otherwise incomplete GIM-10 forms may result in delays in SOM proposal approval.
- Individuals disclosing SFI may also attach their Disclosure Explanation as a second page of the scanned and signed GIM-10 form.
 - Alternatively, individuals who wish to keep this information confidential may continue to send the Disclosure Explanation directly to their OSP Administrator in a sealed confidential envelope.

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• <u>It is important for all sealed, hard copy disclosures to include the relevant eGC1 number on the document in order to match up proposals and disclosures</u>. Failure to provide the eGC1 number will likely lead to delays.

Process for SFI forms routing after proposal submission, or for activities with no eGC1 identity:

- The GIM-10 forms must be routed as email attachments to the SOM Grant Review Unit (douglas@uw.edu). The relevant eGC1 number should be entered into the proper field on the form.
- The GIM-10 pdf must contain signatures of the Disclosing Person and his/her Chair before routing to the SOM Grant Review Unit for review with the complete proposal. Digital signatures are accepted.
- The SOM Grant Review Unit will download and sign off on each GIM-10 form, then upload the updated pdf and route to OSP.
- Individuals disclosing SFI may also attach their Disclosure Explanation as a second page of the scanned and signed GIM-10 form.
 - Alternatively, individuals who wish to keep this information confidential may continue to send the SFI Disclosure Explanation directly to their OSP Administrator in a sealed confidential envelope.
 - It is important for all sealed, hard copy disclosures to include the eGC1 number on the document in order to match up proposals and disclosures. Failure to provide the eGC1 number will likely lead to delays.

Recently HHS issued a new federal regulation regarding SFI disclosures for PHS funded research. This regulation goes into effect in August 2012 and will require that UW revise GIM 10. The streamlining of GIM-10 form routing described in this memo is a temporary change pending review of GIM 10 in the coming months.

If you have any questions regarding this change of routing both GIM-10 forms and SFI disclosure explanations, then please contact Janell Douglas, Grants Review Manager, School of Medicine (206-685-7509, douglas@uw.edu). Questions regarding Significant Financial Interest disclosure policies should be directed to Lauren Exnicios, Director of Regulatory Guidance, School of Medicine (206-543-6047, exnicios@uw.edu).

Cc: Karen Elledge Lauren Exnicios Janell Douglas