

Coeus®

Version 4.2

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Annual Conflict of Interest Disclosure

Instructions and User Guide for Faculty

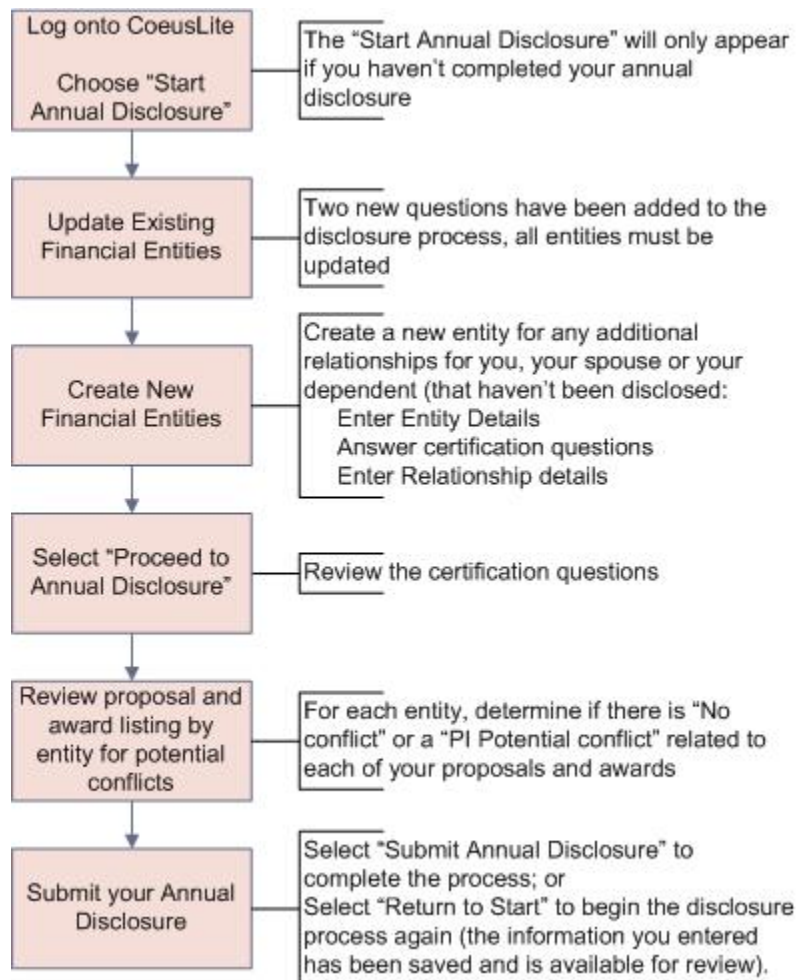
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Overview of Conflict of Interest

The Conflict of Interest process consists of the steps shown here. These steps are explained in detail in this guide.



Financial Disclosure System

The Financial Conflict of Interest (FCOI) Definition:

As defined by the federal government, a financial conflict of interest arises when an employee is involved in a particular activity as part of his/her official duties with an outside organization with which he/she also has a financial interest, or one which is imputed to him/her, (i.e., through the employee's spouse). Examples of relationships that need to be disclosed include when a researcher serves as an officer, director, trustee, partner, or employee of an organization other than MIT. Financial conflicts of interest can arise out of the fact that MIT's academic mission includes both research and the commercialization of technologies derived from that research. In all cases, an individual's actions or decision cannot be determined by consideration of personal financial gain, nor can the objectivity of research at MIT be influenced by a real or perceived financial conflict of interest.

Policy Summary:

Since October 1, 1995, Federal regulations require that the existence of a conflict of interest or the potential for a perceived conflict of interest of an investigator (or his or her immediate relatives) be disclosed to the Institute when the investigator applies for or receives support from NSF, NIH and certain other federal agencies. In addition, an annual disclosure is required to keep all proposal and award disclosures current.

Under the Federal Government's and MIT's policy:

Financial interest means anything of monetary value, including but not limited to salary or other payments for services (e.g., consulting fees or honoraria); equity interests (e.g., stocks, stock options, or other ownership interests); intellectual property rights (e.g., patents, copyrights and royalties from such rights).

- In the case of salaries, royalties, or other payments, an interest is defined as "significant" if it exceeds, or is expected to exceed \$10,000 during a 12 months period, when aggregated for the investigator, the investigator's spouse, and dependent children.
- An equity interest is defined as "significant" if its value is or is expected to be (i) in excess of \$10,000 or ii) represents more than a 5% ownership interest in any single organization (i.e. entity).

For purposes of this disclosure process, researchers are not required to disclose:

- Salary, royalties or other remuneration from MIT;
- Income from seminars, lectures, or teaching engagements sponsored by public or nonprofit entities;
- Income from service on advisory committees or review panels for public or nonprofit entities;
- Salary, royalties, or other payments made by any single entity that, when aggregated for the investigator and the investigator's spouse and dependent children; are not expected to exceed \$10,000 during the next twelve month period; or
- An equity interest that, when aggregated for the investigator and the investigator's spouse and dependent children, meets both of the following tests:
 - Is less than \$10,000 in value as determined through reference to public prices or other reasonable measures of fair market value,
 - and
 - Is less than a 5% ownership interest in any single entity.

Who receives the disclosure?

This is a disclosure to MIT; the Institute will certify to the funding agency that you have disclosed the required information and whether the agency's conflict of interest policy has been satisfied. The information you disclose will be kept confidential to the extent permitted by law, but if a conflict has been identified in connection with PHS-supported research and is being managed, that information must be disclosed to the agency.

What information is requested?

1. Information about any organization, including public, private, for-profit and not for profit organizations (called “entities”), which meet the “significance” threshold described above.
2. Information about the extent to which your research here at MIT overlaps with the work of any entities with which you have a financial relationship.

How do I complete my Annual Conflict of Interest Disclosure?

Conflict of Interest (COI) disclosures are completed electronically in the CoeusLite application <http://coeus.mit.edu/coeus>. Click on the “COI Disclosure” tab at the top of the screen.

How often do I need to complete a COI disclosure?

For each proposal: The **financial disclosure** information needs to be submitted with each proposal (as currently done), *including updating any financial entities, as necessary.*

The **financial entity** information needs to be provided only once and will remain in your record until updates are made, which you can do through this site at any time. Since history is maintained, deletions are not allowed. Entities can be marked as “Inactive” in the event the individual no longer has a financial relationship with a previously disclosed entity.

Annually: Notifications will be mailed once a year to prompt individuals to submit an annual disclosure for pending proposals and active awards. Additional instructions are located within this document to complete the annual certification process. Individuals that utilize the web-based system will be able to take full advantage of the new streamlined annual certification process.

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How do I get help?

If you have trouble using the system, please send e-mail to coeus-help@mit.edu.

Additional resources

OSP Policy on Financial Conflict of Interest:

http://web.mit.edu/osp/www/Financial%20Disclosure%20Policy_Financial%20May%202008.pdf

Draft Guidance on Financial Conflicts of Interest for Researchers:

http://web.mit.edu/osp/www/DRAFT_COI_July2008.pdf

NIH COI Information:

<http://grants2.nih.gov/grants/policy/coi/>

NIH Frequently Asked Questions:

<http://grants.nih.gov/grants/policy/coifaq.htm>

NSF COI Policies:

http://www.nsf.gov/pubs/manuals/gpm05_131/gpm5.jsp#510

Instructions for Annual Disclosures

Completing the Annual Disclosure Form in CoeusLite

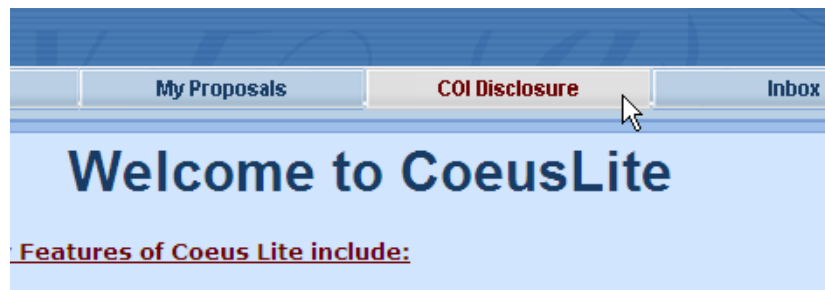
➡ Access the COI Form

1. Open your internet browser.
2. Go to CoeusLite at: <http://coeus.mit.edu/coeus>.



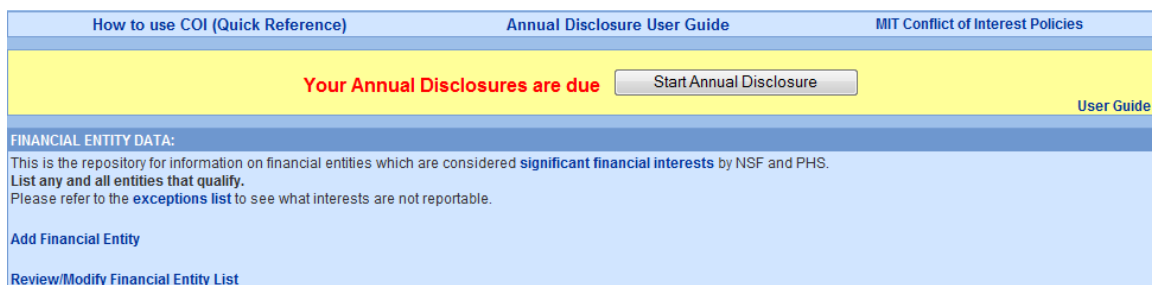
NOTE: You will need an MIT digital certificate to access the Annual Disclosures process. You can obtain a certificate at <http://web.mit.edu/ist/topics/certificates/index.html>, for assistance obtaining certificates contact the IS&T Computing Help Desk at x3-1101 or computing-help@mit.edu.

3. Click on the “COI Disclosure” Tab at the top of the screen



4. Select “Complete Annual Disclosures” to begin the Annual Disclosures process.

The Annual Disclosure alert will appear once OSP initiates the system to generate disclosures for the annual process.



Verify Your Financial Entities

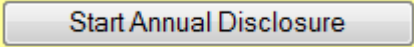
Financial entities should be reviewed and any new entities entered **before** submitting the annual disclosure since these entities will flow naturally into future disclosures.

You **must** disclose financial entity information if you answer **yes** to any of the questions listed below:

1. For **any** entity (company or public or non-profit organization) did you receive in the last 12 months, or do you expect to receive in the next 12 months, salary, director's fees, consulting payments, honoraria, royalties or other payments for patents, copyrights or other intellectual property, or any other payments exceeding \$10,000 (aggregate for yourself, your spouse, and your dependent children)?
2. Do you have stock, stock options, or other interests of significant monetary value in **any** company? The government defines "significant" as \$10,000 or more (aggregate for yourself, your spouse, and your dependent children).
3. Do you have stock, stock options, equity or other interests in excess of 5 percent of the ownership interest in **any** company (aggregate for yourself, your spouse, and your dependent children)?

➡ Completing the Annual Disclosure:

1. Select the "Complete Annual Disclosure" button.



Start Annual Disclosure



NOTE: New certification questions are required for each entity (as of June 2008); you will need to review all "**active**" entities and answer the new questions for each entity before completing your Annual Disclosure.

2. Your Financial Entity screen will appear. The screen will include a list of all of your Financial Entities (both active and inactive). Additionally, a list of financial entities that need to be edited will appear at the top of the screen (above the "Add New Financial Entity" button).

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NOTE: If you have no Financial Entities, you must still answer the certification questions. Select “Proceed to Annual Disclosure” to complete the process.

Edit a Financial Entity

- For each Financial Entity that needs to be reviewed, select [\[Edit\]](#). (Due to the change in questions for the 2008 Annual Disclosure, you will need to edit each active entity.)

Entity Name	Status	Relationship to Entity	Last Update	
Alkmeres Corp.	Active	Board of Directors [...]	10-16-2007 04:39 PM by cwood	[Remove] [Edit]
Rosetta Genomics	Active	Consultant [...]	10-16-2007 04:58 PM by cwood	[Remove] [Edit]

- Answer the certification questions. (For more information on the questions, select the “More about this question” link within the question description.)

Certification - aggregate for yourself, your spouse and your dependent children	
Question 1:	From this entity did you receive in the last 12 months, or do you expect to receive in the next 12 months, salary, director's fee, consulting payments, honoraria, royalties or other payments for patents, copyrights or other intellectual property, or any other payments that will exceed \$10,000 (aggregate for yourself, your spouse, and your dependant children)? More about this question * <input checked="" type="radio"/> Yes <input type="radio"/> No
Question 2:	For this entity, do you have stock, stock options, or other interests of "significant" monetary value? The government defines "significant" as \$10,000 or more More about this question * <input type="radio"/> Yes <input checked="" type="radio"/> No
Question 3:	For this entity, do you have stock, stock options, equity or other interests in excess of 5 percent of the ownership interest? More about this question * <input type="radio"/> Yes <input checked="" type="radio"/> No

- Enter your relationship to this entity in the “Your Relationship to this Entity” fields; by default the “type” will be identified as Board of Directors.

Note: If you enter the type “Other” or “Relationship is through Spouse/Dependent Children” you will be required to enter a description.

Your Relationship to this Entity
* Type: Relationship is through Spouse/Dependent Children
Describe Relationship: My wife is on the Board of Directors for this IT company, and has been for several years. This is a paid position in excess of \$10,000 in the form of stocks and a consulting income.

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6. Enter a description of the relationship between this financial entity and your MIT research. If there is no relationship, enter NONE. (This is a required field.)

Financial Entity's relationship with your MIT research

* Describe Relationship with your MIT research. If there is no Relationship with your MIT research say 'NONE' :

The work of this company is in no way related to my research here at MIT.

7. When all edits are complete, select the “Save” button.

Add New Financial Entities

8. From the Financial Entities screen, select the “Add Financial Entity” button to add any additional financial entities.

Add New Financial Entity

Entity Name	Status
-------------	--------

9. Enter the details of the business or institution in the Entity Details fields.

Entity Details

* Entity Name :

Type : For-profit Organization (other than small b)

Create Date : by

Last Update : by

10. Answer the certification questions. (For more information on the questions, select the “More about this question” link within the question description.)

Certification - aggregate for yourself, your spouse and your dependent children

Question 1: From this entity did you receive in the last 12 months, or do you expect to receive in the next 12 months, salary, director's fee, consulting payments, honoraria, royalties or other payments for patents, copyrights or other intellectual property, or any other payments that will exceed \$10,000 (aggregate for yourself, your spouse, and your dependant children)? [More about this question](#) * Yes No

Question 2: For this entity, do you have stock, stock options, or other interests of "significant" monetary value? The government defines "significant" as \$10,000 or more [More about this question](#) * Yes No

Question 3: For this entity, do you have stock, stock options, equity or other interests in excess of 5 percent of the ownership interest? [More about this question](#) * Yes No

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11. Enter your relationship to this entity in the “Your Relationship to this Entity” fields (by default the “type” will be identified as Board of Directors).

Your Relationship to this Entity

* Type :
Consultant

Describe Relationship :

12. Enter a description of the relationship between this financial entity and your MIT research. If there is no relationship, enter NONE. (This is a required field.)

Financial Entity's relationship with your MIT research

* Describe Relationship with your MIT research. If there is no Relationship with your MIT research say 'NONE' :

My consulting work for this company is related to providing advice on the development of new testing methods. My research at MIT is the development of devices, which is in no way related to this consulting work.

13. Click the “Save” button when finished.
14. Your financial entity has been successfully added. You must follow the above steps for each entity you are disclosing.

Remove a Financial Entity from the list

See page 5 for a list of categories you are not required to disclose. Remove any entities that fall within those categories.

15. For each Financial Entity that should be removed from your list, select [\[Remove\]](#).
16. For auditing purposes, enter an explanation for the removal.

For auditing purposes, a financial entity cannot be deleted. It can, however, be made inactive. Inactive financial entities will not be included in any future disclosures. Please enter an explanation for the inactive status of the entity.

Save



NOTE: Financial Entities that are removed become “inactive”; they are never actually “removed” from your disclosure list due to auditing purposes.

Proceed to Annual Disclosures

17. When all of the entities have been reviewed and the certification questions have been answered, you may proceed to the Annual Disclosure.



NOTE: The “Proceed to Annual Disclosure” button will appear once you have completed the certification questions and other information for each financial entity.

Completing the Annual COI Disclosure

➡ Complete the Annual COI Disclosure

1. Click the “Proceed to Annual Disclosure” button.

Proceed to Annual Disclosures

2. Review the three certification questions. These questions summarize the answers given for each of the entities that you have disclosed, and answers them automatically.
3. Click the “Save and Proceed” button.



NOTE: If you change one of the summarized answers, you will need to update the answer for the entity that is now in conflict.

To update the entity, click on the entity name (highlighted in red) within the message that appears and update the answer. When you select “save” it will return you to this screen.

Identify Conflict status for each entity



NOTE: You must identify conflict status for each proposal and for each entity. You will see your list of entities on the left of the screen, and in the main portion of the screen, you will see all of your Awards and Institute Proposals listed. Once you have updated a particular entity, a check will appear beside the name of the entity on the list.

- At the top of the screen, you will see the entity in red text for which you are currently updating.

Annual Disclosure for Dowdy, Stephen D - **Coca-Cola Co.**
 All of your awards and proposals that require COI disclosure are listed here. Think about your relationship with **Coca-Cola Co.** and update the conflict status as appropriate.

- Select a conflict status, either “No conflict” or “PI Potential Conflict” for each Award and/or Proposal for this entity.

Set Conflict status for all Awards and Proposals to :

Sponsor	Title	Conflict Status	Award / Proposal	Number
NIH	Proposal to NIH	<input type="text" value="-Please Select-"/>	Award	000842-001
NSF	Award from NSF	<input type="text" value="-Please Select-"/>	Award	014361-001
NIH	My research proposal	<input type="text" value="-Please Select-"/>	Institute Proposal	07061101

- When you have completed selecting the conflict status for each Award and/or Proposal for this entity, click the “Save and Proceed to Next Entity” button.

This will bring you automatically to the next entity on your list, and will show a checkmark beside the entity that you have completed.

✓ Biogen
✓ Coca-Cola Co.
ImClone
Intel

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7. When you have updated the conflict of interest disclosure for all entities and all Proposals and Awards, you will be brought to the final Annual Disclosure Screen.

Select "Return to Start" to start over and re-enter all of your entities and disclosures before submitting.
Select "Submit Annual Disclosure" to complete your annual disclosure process.

Return to Start

Submit Annual Disclosure

8. Click the "Return to Start" button to start over and re-enter all of your entities and disclosures before submitting. The data you have entered will not be saved, you will need to re-enter all of the questions and review all of the entities again.
9. Click the "Submit Annual Disclosure" button if you are done. This will notify OSP that you have completed the annual disclosure process. You will be taken to the main Conflict of Interest page and the Annual Disclosure alert will no longer appear.

Annual Disclosures Has been Submitted Successfully.