

Coeus®

Version 4.3

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## **Annual Conflict of Interest Disclosure**

Instructions and User Guide for Faculty

August 2009

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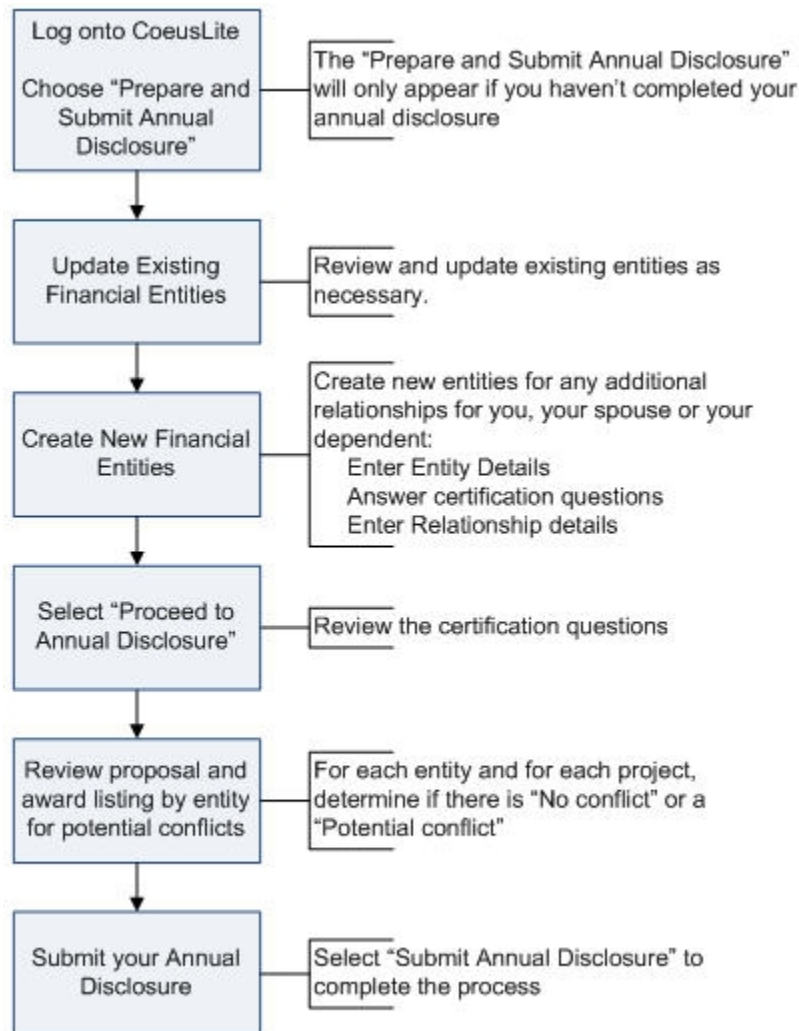
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## Overview of Conflict of Interest

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



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## Financial Disclosure System Process

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### **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.

### **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.

### **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.

### **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.

### **How do I get help?**

If you have trouble using the system, please send e-mail to [coeus-help@mit.edu](mailto:coeus-help@mit.edu).

### **Additional resources**

OSP Policy on Financial Conflict of Interest:

[http://web.mit.edu/osp/www/Financial%20Disclosure%20Policy\\_Final%20May%202008.pdf](http://web.mit.edu/osp/www/Financial%20Disclosure%20Policy_Final%20May%202008.pdf)

Draft Guidance on Financial Conflicts of Interest for Researchers:

[http://web.mit.edu/osp/www/CONFLICT%20OF%20INTEREST\\_draft\\_11\\_11\\_07.pdf](http://web.mit.edu/osp/www/CONFLICT%20OF%20INTEREST_draft_11_11_07.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](http://www.nsf.gov/pubs/manuals/gpm05_131/gpm5.jsp#510)

## Instructions for Annual Disclosures

### Completing the Annual Disclosure Form in CoeusLite

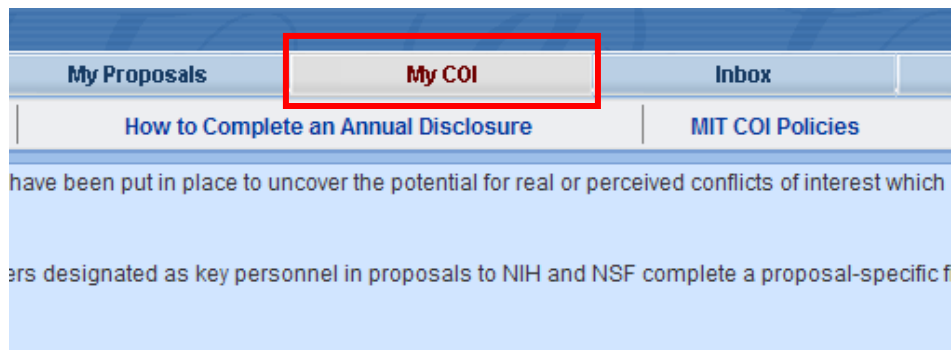
#### ➡ Access the COI Webpage

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

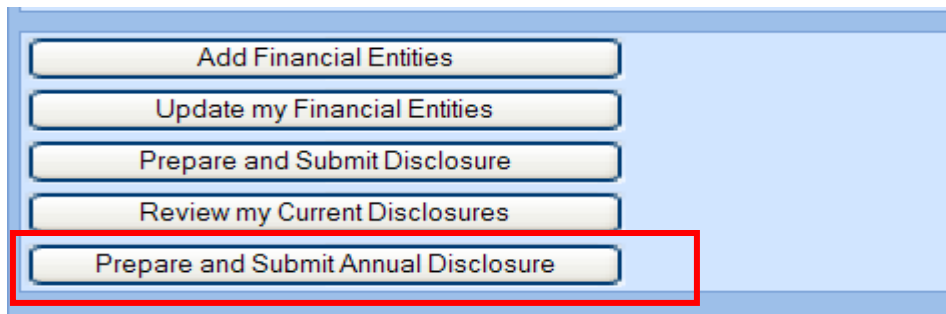


**NOTE:** You will need an MIT digital certificate to access the Annual Disclosures process. You can obtain a certificate at <http://ist.mit.edu/services/certificates>, for assistance obtaining certificates contact the IS&T Computing Help Desk at x3-1101 or [computing-help@mit.edu](mailto:computing-help@mit.edu).

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



4. Select “Prepare and Submit Annual Disclosure” to begin the Annual Disclosures process.



## Verify and Update 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)?

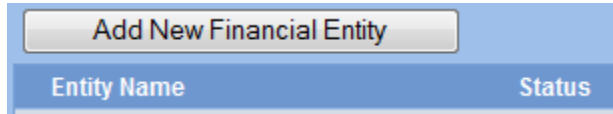
The screenshot shows the CoeusLite interface for user Donahue, Noelle E. The 'My COI' tab is active. Below the navigation bar, there are links for 'How to complete a Proposal Disclosure', 'How to Complete an Annual Disclosure', 'MIT COI Policies', and 'Pending Discl.'. The main content area is titled 'Financial Entities for Donahue, Noelle E' and contains the text: 'Your current list of financial entities is displayed below. Please review their accuracy before proceeding.' Below this text is an 'Add New Financial Entity' button and a table of existing entities.

Entity Name	Status	Relationship to Entity	Last Update
Microsoft	Active	Stockholder [...]	07-16-2009 03:16 PM ncaissie [Deactivate] [Edit]
Pepsi	Active	Other [...]	07-16-2009 03:18 PM ncaissie [Deactivate] [Edit]

At the bottom of the table area is a 'Proceed to Annual Disclosures' button.

**Add New Financial Entities as Needed**

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



- 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

- 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

- 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).

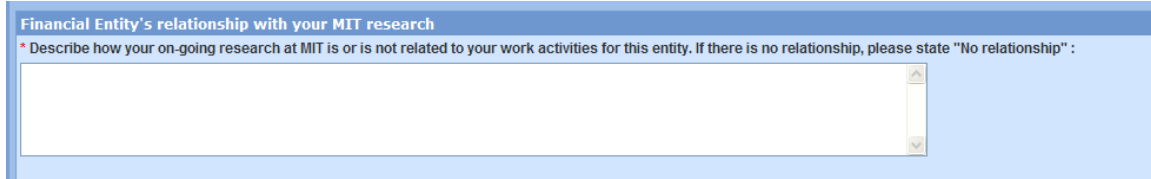
**Your Relationship to this Entity**

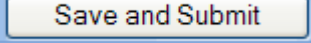
\* Type : Consultant

Describe Relationship :

- Enter a description of the relationship between this financial entity and your MIT research. If there is no relationship, enter “No Relationship.” (This is a required field.)


## COEUS 4.3 – Annual Conflict of Interest Disclosure

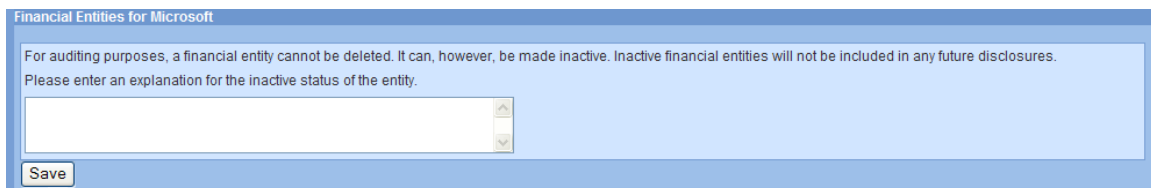


9. Click the  button when finished.
10. Your financial entity has been successfully added. You must follow the above steps for each entity you are disclosing.

### ***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.

11. For each Financial Entity that should be removed from your list, select  to the right of your entity.
12. For auditing purposes, enter an explanation for the removal.



**NOTE:** Financial Entities that are deactivated are never actually “removed” from your disclosure list due to auditing purposes.

### ***Proceed to Annual Disclosures***

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

## COEUS 4.3 – Annual Conflict of Interest 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 Disclosure:**

1. Select the “Proceed to Annual Disclosures” button.

Proceed to Annual Disclosures

2. The certification questions will appear. Please review the answers and update if necessary. Click

Save And Proceed

**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



**NOTE:** If you have no Financial Entities, you must still answer the certification questions.

### **Review Proposal and Award Listing by Entity for Potential Conflict**

3. For each Financial Entity, you will need to disclose any potential conflict on your proposals and/or awards.

Microsoft  
Pepsi

**Annual Disclosure for Donahue, Noelle E - Microsoft**

For all of your Proposals and Awards, Think about your relationship with **Microsoft** and update the conflict status as appropriate.

Set Conflict status for all Awards and Proposals to:

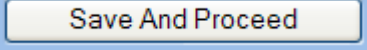
Sponsor	Title	Conflict Status	Award / Proposal	Number
NIH	Noelle's Annual Disclosure	<input type="text" value="-Please Select -"/>	Award	016266-001
NIH	Noelle's Proposal for Annual Disclosures	<input type="text" value="-Please Select -"/>	Institute Proposal	10010224

Describe how your on-going research at MIT is or is not related to your work activities for this entity. If there is no relationship, please state "No relationship":  
Testing.

Save and Proceed

## COEUS 4.3 – Annual Conflict of Interest Disclosure

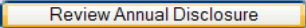
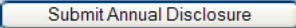
4. In the conflict status drop down box, select either Potential Conflict or No Conflict. In the comment box, describe how your on-going research at MIT is or is not related to your work activities for this entity. If there is no relationship, please state "No relationship":

5. Click .

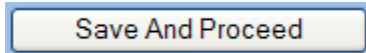
### ***Submit Your Annual Disclosure***

6. 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 "Review Annual Disclosure" to Review and start-over all of your entities and disclosures before submitting.  
Select "Submit Annual Disclosure" to Submit to disclosure process.

7. Click the "Review Annual Disclosures" button if you wish to review the information disclosed. When your review is complete, click



8. Click the "Submit Annual Disclosure" button when you are done. 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.**

You will receive an email message confirming the successful submission of your annual disclosure.