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TO: Academic Deans, Laboratory Directors, Department Heads,
Administrative Officers, NIH/NSF Investigators

FROM: Robert A. Brown, Provost

DATE: July 1, 2004

SUBJECT: Annual Conflict of Interest Disclosures

Approximately 18 months ago, the Office of Sponsored Programs (OSP) released a secure on-line web-based system to allow principal investigators and other researchers to submit the required conflict of interest disclosure forms for NSF and NIH electronically and confidentially to OSP's director. This web-based system replaces the paper intensive submission process which has been in place since the requirements were mandated. Approximately 40% of the disclosures are now being submitted electronically to OSP. In the next fiscal year, we would like to move to use the web-based system for essentially all submissions.

The web-based system significantly streamlines the submission of the financial disclosure information required by NSF and NIH and provides a firm foundation if/when the federal government extends the disclosure requirements to other agencies. It provides a method for investigators to submit the documentation from remote locations and to update financial entities on-line. It also provides a simple method to provide annual updates for current awards and pending proposals. As with the paper system, the disclosure information is treated as highly confidential and is limited to the Director of Sponsored Research and the Vice President for Research.

The Federal requirements surrounding conflict of interest also mandate that faculty, no less than once a year, update his/her disclosure information for all active awards and pending proposals to NIH and NSF. This year, the submission of the annual update will be done electronically through the web-based system. Additionally, all future disclosures for new proposals to NIH and NSF will be done electronically through the system. *Paper-based forms will only be accepted from faculty and other key persons listed on projects that are not MIT employees and/or are unable to obtain digital certificates.*

The process for submitting the annual disclosure as well as routine disclosures for new proposals is described in the attached instruction manual. If you have any questions at this time, please contact Julie Norris at 3-2492, Steve Dowdy at 3-6925, or Tom Duff at 3-7086. If you need assistance, please send e-mail to coeus-help@mit.edu and someone from the OSP staff will be happy to assist any faculty member who is having difficulty completing the electronic annual disclosure.

I very much appreciate your cooperation in this initiative to move the submission of this required information to the web-based format. Please contact Julie Norris, Director of OSP, if you have any questions.

Enclosure

cc: Prof.. Alice Gast
Ms. Julie Norris