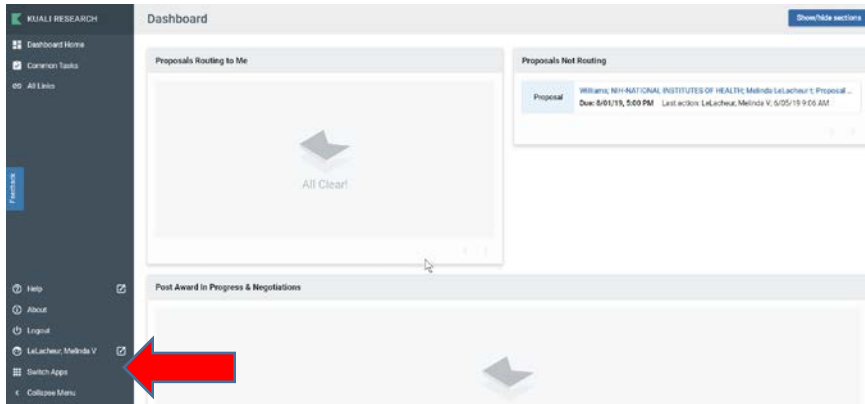
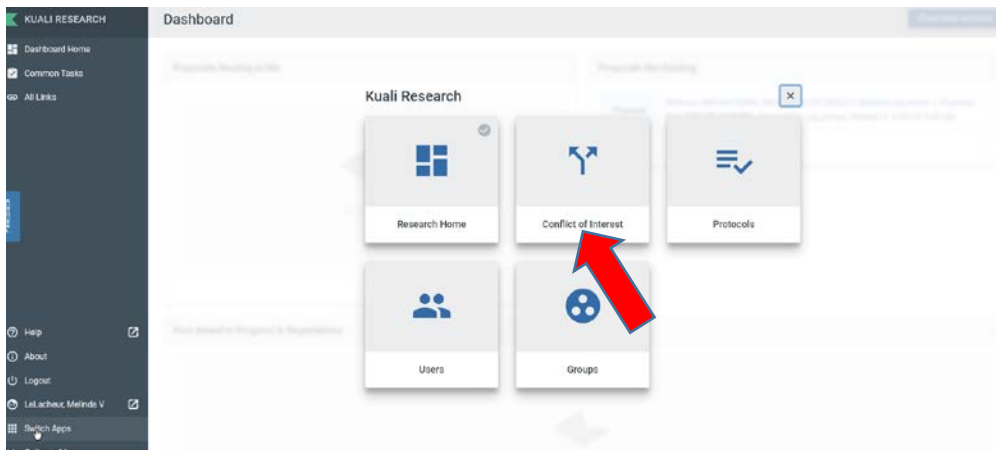


## Creating your Annual COI Disclosure in Kuali

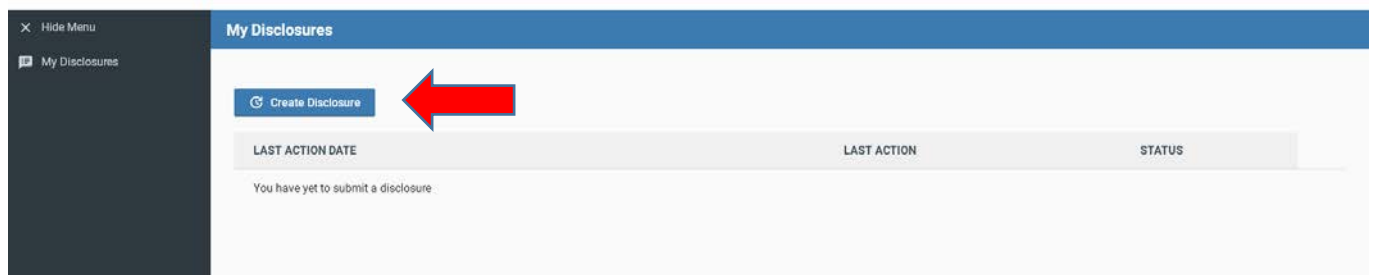
- **LOG IN**  
[https://www.umb.edu/orsp/kuali\\_research](https://www.umb.edu/orsp/kuali_research) using your NetID and Password
- Select **Switch Apps** on the lower left margin (the icon has 9 dots).



- Select **Conflict of Interest** in the middle (the icon has two arrows).



- If this is your first time in Kuali COI, the small blue box will say **Create Disclosure**. If not, it will say **Update Disclosure**. In either case, click on it.



## Now you have entered the COI Disclosure form.

- Navigation tips:
  - The list on the left (starting with INTRODUCTION) details the steps needed to complete your form. The circle on the right will show your progress in **green**.
  - The COI disclosure form has progressive display, meaning that the number of questions will increase or decrease depending on the answers you give.
  - Hotlinks and blue question marks will appear throughout and provide you with more details and guidance.
  - If at any point you want to leave and return later, click **Save** and log out using the drop down in the upper right under your name.
  - Use the **Next** button to move through the form.

**Disclosure Form:**  
**Outside Activities/Conflict of Commitment, Conflict of Interest**

The University recognizes that outside activities can be of value to faculty members and the University. In fact, faculty are considered "special state employees" for purposes of the Massachusetts law governing the conduct of employees (Massachusetts General Laws Ch. 268A). This consideration permits faculty to engage in limited activities outside of the University during normal working hours, provided such outside activities do not interfere with their primary obligations. I.e., there is no Conflict of Commitment. That is, faculty members are expected to devote to the University their primary professional loyalty and to direct to the University their appropriate time and energy.

UMass Amherst is also an agency of public trust. Consistent with the principles of ethical conduct established under federal, state and University requirements, all University personnel have an obligation to be objective and impartial in making decisions on behalf of UMass. Those who conduct sponsored activities (e.g. research or training grants) must be mindful of the obligations that accompany stewardship of external funds, including regulations and guidelines to promote objectivity in the conduct of the sponsored activity/research.

To ensure objectivity and stewardship of public funds, members of the University community are expected to:

- Prevent individual or institutional conflicts of interest or conflicts of commitment in their assigned duties for the University;
- Disclose potential conflicts of interest to the University and adhere to any requirements created to manage or eliminate actual or apparent conflicts of interest;
- Ensure personal relationships or outside financial interests do not interfere with objective judgment in decisions affecting University employment, research or the academic progress of a student; and
- Ensure their assigned duties for the University receive their full effort, attention and commitment.

This Integrated Conflicts of Interest and Commitment Disclosure Form collects information regarding conflicts of interest, conflicts of commitment and related topics in order to allow the University to comply with various Federal and State regulations, as further detailed in University policies including the [University Policy for Promoting Objectivity in Biomedical Research](#), the [University Policy for Compliance with NSF and Other Federal](#)

- Navigate through the form, answering ALL questions. New ones will appear as you answer in the affirmative.
  - Example: check the first box on this question and a second question appears.

**Update Annual Disclosure**

**What are your roles at the University?**  
Select from the list of options below

Investigator - includes principal investigator, co-investigator, or key personnel on any research project having responsibility for the design, conduct or reporting of the research

University employee (non-researcher) - includes faculty, staff, and student appointments not related to or engaged in the conduct of research

Graduate Student Research Assistant

Undergraduate Student Research Assistant

Other

Are you currently funded by or preparing to apply to any U.S. Public Health Service agency (e.g., National Institutes of Health, Centers for Disease Control and Prevention) and/or any other entity that adheres to the PHS COI guidelines?

NOTE: The following entities adhere to the PHS guidelines:

- PHS Funding Agencies and Offices
- Non-PHS Agencies (e.g., Korea, Alpha-1)

Yes

No

## Training page

- This page includes the status of training required under PHS/NIH COI policy. Follow the links if you have any questions or concerns.

**Research Conflicts of Interest Training**  
Please read the following training material regarding your role and participation in research funded by the U.S. Public Health Service (PHS) as a UMinn Amherst faculty or staff member.

**University Policy on Financial Conflicts of Interest in Public Health Service Research**  
University personnel and students who are covered by the University Policy for Promoting Objectivity in Biomedical Research (University PHS policy) share an obligation to conduct their professional activities in a manner consistent with the University's mission and to conduct their relationships with each other and the University with candor and integrity. This policy requires individuals participating in or proposing to participate in PHS-funded research to identify and, when possible, avoid financial conflicts of interest. Where conflicts cannot be avoided, covered persons must disclose outside financial relationships that create, or reasonably appear to create, conflicts of interest, and to work with University officials to manage or resolve these conflicts. The University PHS policy applies to all persons at UMinn Amherst who are "investigators" under PHS regulations which includes anyone who is responsible for the design, conduct or reporting of research funded by the Public Health Service (or those proposing for funding), including consultants, subcontractors or casual collaborators. The disclosure process has been developed in part to meet Federal regulations, described further below.

**Public Health Service Regulations**  
The Public Health Service has promulgated regulations to promote objectivity in research by establishing standards that provide a reasonable expectation that the design, conduct and reporting of research funded under PHS grants or cooperative agreements is free from bias resulting from investigator financial conflicts of interest (FCOI). The investigator, the institution and the PHS funding agency (e.g., National Institutes of Health) share responsibility to ensure reported research is free from bias. Under the University's Policy for Promoting Objectivity in Biomedical Research and PHS regulations, a Significant Financial Interest (SFI) is an outside financial interest meeting a certain monetary threshold; such SFI must be disclosed if the interest reasonably appears to be related to an investigator's university responsibilities. Your responsibilities include, but are not limited to, activities such as research, research consulting, teaching, professional practice, institutional committee membership and service on panels such as the Institutional Review Board or Data Safety Monitoring Boards. An FCOI means a significant financial interest that could directly and significantly impact the design, conduct and reporting of the PHS-funded research. Family members are defined as the individual's spouse or domestic partner and dependent children.

**PHS Investigator Responsibilities**  
PHS investigators must disclose their own outside financial interests and those of their spouse or domestic partner and dependent children that relate to the investigator's University responsibilities and:  
1. General \$5,000 threshold only in the preceding 12 months. This includes equity ownership, remuneration, reimbursement or sponsored travel, and/or interests or rights from intellectual property when aggregated together.  
2. Ownership interests (e.g., stock, stock options or other forms of ownership) of:  
    a. A NY amount to a non-publicly traded entity (such as a start-up company or small business) OR  
    b. More than \$10,000 in value or 2% ownership in a publicly traded entity.

**NOTE:** Do not report teaching or review panel compensation or travel reimbursement or sponsored when such compensation or travel reimbursement is paid by a U.S. Federal, State or local government agency, a US institution of higher education, a US academic teaching hospital, a US medical center, or a research institute that is affiliated with a US institution of higher education. You do not need to include income from investment vehicles such as mutual funds and retirement accounts as long as the investigator does not directly control the investment decisions made in these vehicles.

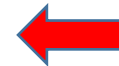
I have read and understand my obligations under the University Policy for Promoting Objectivity in Biomedical Research and PHS regulations and accept my responsibilities concerning financial conflict of interest. I accept and will comply with the conditions and restrictions established by the University to manage, reduce, and/or eliminate any actual or perceived conflicts of interest.

By pressing the next button I certify that I understand and accept the above text.

**Training Status**  
Effective August 24, 2012, each investigator must complete PHS COI training prior to engaging in research related to any PHS-funded grant or contract and at least every five years, and immediately under the following circumstances:  
The current status of your PHS COI training is listed below. Details on completing or updating your training can be found at the bottom of our PHS Conflicts of Interest page.

Contact Research Compliance at [research@research.uminn.edu](mailto:research@research.uminn.edu) or 410/249-2424 with questions.

PHS Financial Conflict of Interest Course (Stage 1) - 32/07/17 - 01/31/21	PHS Financial Conflict of Interest Course (Refresher) - 05/07/18 - 01/31/21
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## Potential Conflicts of Interest and/or Commitment

- The next few pages will ask you to disclose potential Conflict of Interests and Conflicts of Commitment. **You must answer ALL questions.**
  - First you will be asked about categories of potential conflict.

**Update Annual Disclosure**

Reporter: LeLachue, Melinda V. melinda@research.uminn.edu. Disclosure Status: In Progress. 60% Complete.

**Research Conflict of Interests**  
Please answer all questions below. Selecting "Yes" on any will prompt completion of the Outside Entity information section that will appear later in the process.  
\* NOTE: As included in the questions below, "family members" refers to spouse, domestic partner, and/or dependent children.

During the past 12 months, did you and/or your family members receive aggregated compensation, monetary or in-kind, exceeding \$5,000 in value from any single external entity (not UMinn) operating in areas relating to your UMinn responsibilities?  
Please consider only compensation earned by you and your family members and do not include compensation from teaching, general fees, honoraria or reimbursement for travel and lodging related to any interest or right in intellectual property, sponsored research, stock, stock options or gifts.

Yes  
 No

Did you and/or your family members hold at some point during the past 12 months any ownership in a publicly traded external entity operating in areas relating to your UMinn responsibilities which, when aggregated together for all of you, represents an equity interest that exceeds \$5,000 in value or 2% ownership of a public entity?  
 Yes  
 No

Did you and/or your family members hold at some point during the last 12 months any ownership interest in a non-publicly traded external entity operating in areas relating to your UMinn responsibilities (e.g., faculty start-up or family business related to your research)?  
 Yes  
 No

**Update Annual Disclosure**

Reporter: LeLachue, Melinda V. melinda@research.uminn.edu. Disclosure Status: In Progress. 80% Complete.

**Disclosure and Approval of Consulting and Outside Activities**  
Please answer all questions below. Selecting activities will prompt completion of the Outside Entity information section that will appear later in the process.  
\* For more information on outside activities, please see the UMinn Policy on Faculty Consulting and Outside Activities: Amherst & Boston.

Are you involved in any paid activities outside UMinn Amherst? (i.e., non-academic activities as defined in the UMinn Policy on Faculty Consulting and Outside Activities and/or other academic appointments, paid or unpaid, at universities, medical institutions or other entities which should be part of the biosketch or curriculum vita).  
 Yes  
 No

A number of Federal sponsoring agencies have raised concerns regarding foreign influences on research integrity. Do you have any academic or non-academic foreign collaborations (funded or unfunded) that may require disclosure?  
 Yes  
 No

- If you answered **No** to **ALL** of the category questions, you will be brought to the **Certification** page (see below).

## Outside Entity Information

- Answering **Yes** to **ANY** of the category questions will bring you to the **Outside Entity Information** page.
  - Follow the instructions in red to add or modify Entities that correspond to your positive answers.

The screenshot shows the 'Update Annual Disclosure' interface. The 'OUTSIDE ENTITY INFORMATION' section is highlighted. Below the instructions, there is a table with columns for 'ACTIVE', 'ENTITY NAME', and 'OUTSIDE ENTITY RELATIONSHIP'. A red arrow points to the '+ Add Info' button located below the table headers.

- **Adding an entity:**
  - Click **+Add info** (in black, just below the explanatory text).
  - The **Add Entity** form will appear. Answer **ALL** of the questions using the text boxes and drop down menus.
  - Under the **Relationship** form section, click **+Add Info** and a new pop up will ask you to identify the person involved with this entity and the amount of compensation. Answer all questions here as well.
  - Click **Done** after completing each pop up form.

This is the 'Add' form for adding an entity. It contains the following sections:
 

- Is your engagement with this entity ACTIVE and ONGOING?** (Radio buttons for Yes/No)
- Entity Name** (Text input)
- Entity Type** (Dropdown menu)
- Relationship Form** section with instructions:
  - To enter the Relationship: Click '+ Add Info' below.
  - To enter an Additional Relationship: Click the '+ Add Line' to the right.
  - To edit Existing Relationships: Select the Edit Pencil next to the entity name.
  - To delete an Existing Relationship: Select the Trash Can next to the entity name.
- Buttons: Columns, + Add Line
- Table header: PERSON, COMPENSATION AMOUNT
- + Add Info button
- Bottom section: 'Select the appropriate option below to describe the engagement activity with this entity:' and 'Does this entity sponsor any of your research?' (Radio buttons for Yes/No)
- Buttons: Cancel, Done

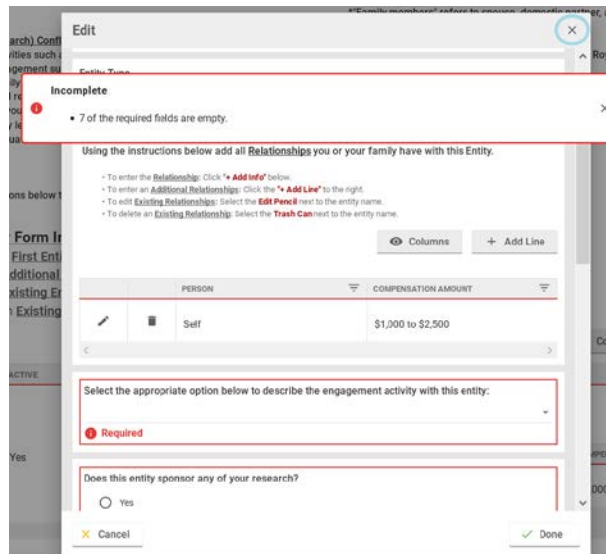
This is the 'Entity Details' form for adding a relationship. It contains the following sections:
 

- Person involved with this entity:** (Dropdown menu)
- Relationship** (Text input)
- Relationship Type** (Dropdown menu)
- Text: 'Indicate the aggregate annual amount of compensation (including the total value of any compensation, sponsored or reimbursed travel, intellectual property rights or interest and any other remuneration received or expected to be received from the entity) in the past 12 months:'
- Text input field for compensation amount
- Buttons: Cancel, Done

- Your Entity will now appear in the form, along with the relationship you have just added. If you have multiple relationships with the same entry (perhaps both yourself and your partner, or you have both consulting and speaker fees), click **+Add line** and complete another relationship form.
  - You can also close this and complete another Entity form, listing the same Entity with a different relationship.

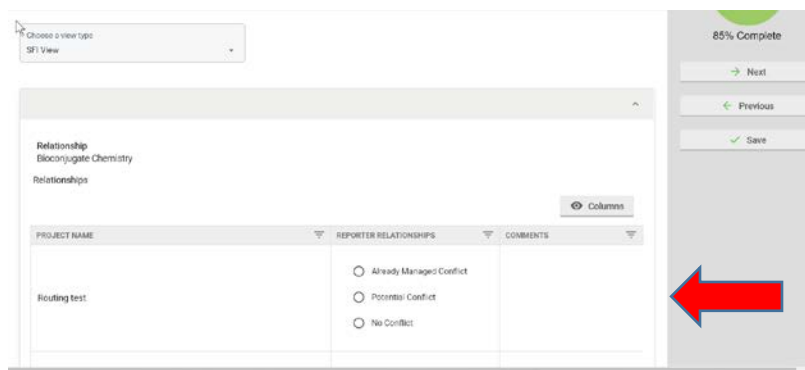
- After you have added all relationships, scroll down to answer the remaining questions and/or upload any required documents.
- Click **Done** to go back to the main **Outside Entity Information** page.
- Repeat this process for all Entities you wish to report and then click **Next**.
- A message will appear in red at the top of the screen if the form is incomplete.
  - Scroll down the page until you find a section surrounded by a red box. That is where the fix needs to occur.

- Go back into the Entity by clicking on the **Edit Pen** to the left.
  - On the **Edit** page, look for the word **Required** in bold red font and enter the information that is missing.
  - After you have done so, click **Done** to return to the **Outside Entity Information** page. Then click **Save**.
  - If there are still red boxes, return to the **Edit** forms and repeat.



### Project Declaration page.

- Next, the form will ask you to assess the relationship between the Entities you included and your project(s).
  - Using the top dropdown menu, choose the **SFI View** or the **Project View**.
  - Under **Reporter Relationships** click the circle that matches your assessment of the relationship between this specific project and the Entity.
  - Enter a comment in the section next to each declaration.
  - Continue down the page until you have entered a declaration for all Projects and Entities, then click **Next**.



## Certification page

- Read the information and click **Submit**. You have now completed your Annual Conflict of Interest Disclosure.

Kuali will bring you back to your main COI page. You will see your disclosure, the last action (which in this case is **Submit**) and the status (**Submitted for Approval** or **Approved**).

- Want to review or print out a copy of your disclosure? Just click the date in blue. It will bring you to an overview of your form, which you can review and print out.

CONFLICT OF INTEREST kuali Williams, Serena T (impersonated by User01, Test)

LAST ACTION DATE	LAST ACTION	STATUS
<a href="#">Feb 27, 2019 12:24 PM</a>	Submit	Submitted for Approval

After your disclosure is submitted, it is automatically routed to the Office of Sponsored Research and Programs where the review process begins. You will receive an email notification when it is approved, if further information is required, if it is due to expire, or if it has expired. In some cases, you will be asked to go back into your disclosure to revise or update the information. See the guide on *Kuali COI Disclosure Revision* more details.

If you have any questions or need assistance with the UMass Boston online Annual Conflict of Interest Disclosure process, please email [ORSP.Disclosures@umb.edu](mailto:ORSP.Disclosures@umb.edu)