



Research Administration Practices (RAP) Sessions

Sponsor Requirements Certification and COI (Part 2)

Presented by:

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Jeff Sullivan Conflict of Interest Officer, VPR

Introductions

Ian Cariolo

Senior Research Administration Education & Support Specialist, VPR

Rupinder Grewal

Senior Conflict of Interest Officer, VPR

Jeff Sullivan

Conflict of Interest Officer, VPR

Agenda

- Kualiti Coeus: KC Certification/COI rules and requirements
 - Quick recap of Part I COI presentation
 - Sponsor Requirements in KC
 - Proposal Type
 - Activity Type (Fellowships)
 - Senior/Key Persons: Employee vs. Non-Employee, MIT Guest Account
 - KC Key Personnel: Role
 - Supplemental Info > COI. Discl. Req. (PC, PCK)
 - Notify for certification
 - Summary/Submit: SFI flag(s)
 - COI Disclosure requirement (validation error)

Key Points from COI Part I

- **COI Policy Purpose:** Promote objectivity in research by increasing transparency, accountability and oversight of financial interests of investigators in federally sponsored research
- **Roles in which carry COI disclosure (& training) requirements:** Those responsible for the design, conduct, or reporting of research such as **Investigator, Co-Investigator, Key Person** (sponsor specific)
- COI disclosure process begins at proposal stage, continues for project period

- **2 distinct and independent reporting processes at MIT: COI and OPA.** OPA is **annual** and is focused on time spend on outside activities; **COI is rolling** and focused on financial activities which could impact research.
- **COI disclosure module and process is not designed to allow proxies.** The Investigator is required to complete and certify that information is accurate

Sponsored Travel, Investigators funded by NIH & DOE among others

Required to disclose “Sponsored Travel” which means all travel which meets the definition is considered an SFI by sponsors that follow PHS regulations. Looking back 12 months at time of proposal and ‘running’ thereafter.

- Just travel (hotel, meals, transportation, etc...)
- If aggregate per entity adds to \$5k over last 12 months
- Travel and consulting
- If aggregate per entity adds to \$5k over last 12 months
- Travel by Investigator and his/her Family
- Investigator completes a separate disclosure for each traveler ‘type’

“*Sponsored Travel* (applies only to PHS Investigators) means (a) travel expenses paid to an Investigator or travel paid on an Investigator’s behalf, by a single entity in any 12-month period and (b) travel reimbursed to or paid on behalf of an Investigator’s Family by a single entity in any 12-month period ONLY if such travel reasonably appears to be related to the Investigator’s Institutional Responsibilities. See the PHS Addendum for more information.”

Travel

- Investigator reports travel in Coeus
- DLCI administrators may assist with tracking for aggregate amounts.

The screenshot shows the CoeusLite web interface. At the top, the user is identified as 'Sullivan, Jeffrey' with a 'Current Locks' link. The navigation bar includes 'Coeus Home', 'My COI', and 'Logout'. A secondary menu contains links for 'Help', 'MIT COI Policy', 'Travel', 'Awards On Hold', 'With Entities', 'No Entities', 'WIP', 'In Progress', and 'Search'. The left sidebar has a 'Disclosure View' section with 'Travel Details' (indicated by '>>') and 'MY COI Home'. The main content area is titled 'Travel Disclosure by Sullivan, Jeffrey' and shows the user's name, department ('401860:VP for Research'), and faculty status ('No'). Below this, a note states that travel reimbursed through MIT does not need to be disclosed under PHS policy. The form contains several required fields: 'Entity Name' (with a dropdown for 'Select an existing SFI' and an 'Add New Entity' button), 'Traveler' (with a dropdown for 'Select Traveler'), 'Trip Title' (with an example: 'AACR conference in LA, 2012'; 'GSK board meeting in London'), 'Destination', and 'Purpose of the trip' (with an example: 'Deliver keynote address; attend annual meeting of the company Scientific'). There is also a field for 'Relationship to your PHS research' with an example text. At the bottom, there are fields for 'Actual U.S. dollar amount reimbursed and/or paid on your behalf (estimate if unknown): \$.00', 'Start Date', and 'End Date'. The form concludes with four buttons: 'Certify', 'Certify & Copy', 'Certify & Create New Travel Disclosure', and 'Save'.

CoeusLite User: Sullivan, Jeffrey Current Locks

Coeus Home My COI Logout

Help MIT COI Policy Travel Awards On Hold With Entities No Entities WIP In Progress Search

Disclosure View
Travel Details >>
MY COI Home

Travel Disclosure by Sullivan, Jeffrey
Name : Sullivan, Jeffrey
Department : 401860:VP for Research
Faculty : No

Please enter the following information for your trip (Note: travel reimbursed through MIT does not need to be disclosed under [PHS policy](#)) ?

*Entity Name: The entity which directly paid on your behalf or reimbursed you for this trip
Select an existing SFI Add New Entity

*Traveler: Who took this trip? You or a member of your Family
Select Traveler

*Trip Title: e.g. "AACR conference in LA, 2012"; "GSK board meeting in London"

*Destination:

*Purpose of the trip: i.e. Deliver keynote address; attend annual meeting of the company Scientific

*Relationship to your PHS research: Describe how this trip for this entity does or does not relate to your PHS sponsored research e.g. "There is no relationship between this trip and any of my PHS research because this trip was to deliver a talk on how to make the best chocolate chip cookies and my PHS research involves the development of a rapid diagnostic for bio-sensing of disease."

*Actual U.S. dollar amount reimbursed and/or paid on your behalf (estimate if unknown): \$.00

*Start Date:

*End Date:

Certify Certify & Copy Certify & Create New Travel Disclosure Save

NIH Investigators: Disclose Sponsored Travel?

A. Prof. Sam Malone

\$9,500 Travel expenses for speaking at forum: airfare, gas, car rental, hotel room, and meals.

Paid by: Australia Department of Climate Change, Energy, the Environment and Water



B. Prof. Rebecca Howe

\$5,500 Travel expenses for speaking at conference: airfare, hotel room, and meals.

Paid by: National Science Foundation (NSF) funded Award at MIT (PI Howe)



Sponsor – KC Rules

KC maintains sponsor rules for COI requirements at proposal and award stage. At proposal stage, requirements apply to certification/COI screening questions. Other factors affect when and how the rules apply.

- **Investigators** (PI/Co-I) at Proposal stage must complete proposal certification which includes 3 SFI screening questions.
- Many sponsors follow the PHS/NIH regulations that has a COI requirement for **Key Persons** (at proposal stage these Key Persons complete 3 COI screening questions).
- Sponsors that do not follow the PHS/NIH regulations will not have any requirement for **Key Persons**.

Department of Energy (DOE) Interim COI Policy

The U.S. Department of Energy (DOE) has issued [Interim Conflict of Interest Policy Requirements](#), which will affect **DOE Awards issued to proposals submitted on or after 12/20/2021**. The interim policy is designed to mirror the PHS (NIH) COI regulations. Key requirements from the DOE interim policy:

- In addition to PIs and Co-Is, Key Persons will be required to complete proposal certifications in KC at proposal stage.
- PI, Co-I's and Key Persons will be required to complete COI disclosure and COI training before funds can be expended at award stage.
- The COI office will be reaching out to affected PIs, Co-Is and key persons, and their Administrative Officers with detailed instructions on how to comply.
- Please note that this is an Interim Policy. More detailed information will be provided as it becomes available. For policy-related questions, please contact coi-help@mit.edu; issues encountered during the proposal or award process should be directed to your RAS contract administrator.

Create Proposal in KC / Notify Key Personnel

Proposal Certification/COI Screening Question requirement is based on:

- **Sponsor (COI Hierarchy)**
- **Proposal Type**
- **Key Personnel Role**
(Employee/Guest, Non-Employee)
- **Supplemental Information - COI Discl. Req.** (manually overrides COI hierarchy)

Proposal Details

* indicates required fields

Proposal Type: *

Lead Unit: 150001 - Center for KC Training

Activity Type: *

Project Dates: * to

Project Title: *

Sponsor: * NIH

Prime Sponsor Code:

Proposal Type



Office of the Vice President for Research
Research Administration Services



Kuali Coeus Proposal Types Quick Reference Card

Procedure:

Kuali Coeus Proposal Type	MIT Definitions and Appropriate Uses	Grants.gov Definition	Sponsor	Original Proposal #	Award #	Previous Grants.gov Tracking ID	Kuali Coeus Certification	Kuali Coeus Routing Map
Budget –SOW Update	Updated proposal documents (e.g. revised budget) requested by Sponsor for a proposal currently undergoing Sponsor review. Example: NSF Proposal File Update Do not use if adding new personnel that need to certify. Use proposal type "New" for this circumstance.	No corresponding definition	Not Applicable	Institute Proposal number (of submission being revised)	Not Applicable	Not Applicable	No - Aggregator does not send certification request.	Changed/Corrected Questionnaire required. Depending on response, it may skip Dean level approval.
New	An application submitted to the sponsor for funding for the first time. An application that has been previously submitted to the Sponsor which adds Investigator and/or Key People who have not previously certified on original proposal. * An application for a portion of work or a task under a fully funded Master Agreement (e.g. RPP, RPO, MIT Alliance)	An Application that is submitted to the Sponsor for the first time.	Not Applicable	Not Applicable * If a Pre-Proposal was submitted, inform your OSP Contract Administrator of its Institute Proposal #	Not Applicable	Not Applicable	Yes	Normal Routing
Pre Proposal	Pre-Application submitted to Sponsor for invitation to submit a full application. Prepare and route in Coeus ONLY IF Pre-application proposal must be submitted through Grants.gov or requires OSP approval/ signature prior to submission to Sponsor.	Pre-Application submitted to Sponsor for invitation to submit a full application.	Not Applicable	Not Applicable	Not Applicable	Not Applicable	No – Aggregator does not send certification request.	Dept Head > OSP CA (skips Dean level approval)

Many Proposal Types, including *New*, *Renewal*, and *Supplement* require certification.

Budget-SoW Update and *Progress Report* do not require certification.

If there is a change in Key Personnel, a Proposal Type that requires certification must be used.

Please refer to the [Proposal Types Reference Card](#) for definitions and appropriate use.

Key Personnel: Employee vs Non-Employee

If a key person external to MIT is required to certify (e.g., KP role “Fellow”, “Co-Mentor”):

1. The DLCI must sponsor a **guest account** through IS&T. Guests complete registration and create a **Kerberos ID**.
2. **The Guest Employee Account must then feed to KC Overnight.**
3. Then the DLCI may add them to the KC proposal as an *Employee* (the person will have an MIT email address to receive notifications to certify).

If a key person external to MIT is *not* required to certify (e.g., KP role “Subaward Investigator”, “Other Significant Contributor”, “Consultant”):

1. If not already in KC, the DLCI must request an Address Book Entry (Non-Employee person in KC) through OST or a RAS webform.
2. DST creates the record, and the external person may be added as Non-Employee to a role that does not require certification.

Sponsored Guest MIT Account

To request a Sponsored Guest account, visit <https://sponsored-accounts.mit.edu/>

 Sponsored Accounts

Sponsored Guest

A sponsored guest account is required for a voucher or temporary staff, former students or staff who are no longer eligible but need continuing access to their account, and visitors who need an MIT electronic identity.

 This application is for requesting new accounts only. To renew or reactivate an existing account, contact servicedesk@mit.edu.



Invite Sponsored Guest

Registering for a sponsored guest account establishes their identity in MIT's Kerberos security system

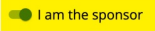
The "Sponsor" denoted on the online form is the individual requesting the sponsored account for an individual.

 Sponsored Accounts

[< Back](#)

Sponsored Guest

For bulk upload, please contact your Covid Access Authorizer.



Cost Object

Department

Guest Information

First Name

☐ Does the guest have an existing MIT ID number?

Access Information

Start Date

01/24/2023

End Date

01/24/2024

Reason for Access

☐ Is the guest being paid by MIT directly?

☐ Physical campus access required

Accounts are created asynchronously two weeks before the guests' start date. Guests will receive a notification for the next steps in the account registration process.

Submit

Cancel

What the "Guest" receives after their new MIT ID is created by the Service Desk. From here they will register their desired Kerberos name.

 Register for your MIT Kerberos Account

Dear Jane Doe,

Welcome to MIT!

You have been assigned MIT ID Number 912345678. To complete your account registration and establish your MIT Kerberos identity please follow the link below and we will guide you through your remaining registration activities.

Complete Registration

If you have any questions or need assistance, contact the service desk at 617-253-1101 or at [IS&T Service Desk](#).

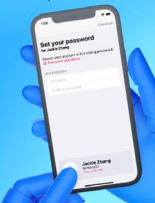
 Download on the App Store

 GET IT ON Google Play

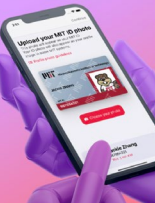
Welcome to MIT

Let's complete your account registration and create your MIT Kerberos identity. You have been assigned MIT ID number : and will be guided through your remaining registration activities.

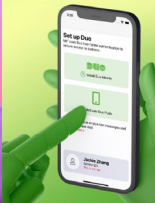
1 Choose your Kerberos Identity and password



2 Upload your ID photo



3 Activate Duo two-factor authentication



If you have questions or need assistance, contact the service desk anytime at +1 617 253-1101 or servicedesk@mit.edu.

Please note that it may take up to 24 hours for your account registration to be complete and for your MIT Kerberos identity to be fully activated.

I'm ready! Let's get started

NIH Proposal must route by 5 PM for 5-day deadline

Key Person Role: Other Significant Contributor?

Peter Plum

- committed to contribute to the scientific development or execution of the project
- Budget: .5 Summer Months
- Organization: Stanford University

Peter Plum doesn't have an MIT Employee record in KC (External person with guest MIT Kerberos required to complete Proposal Certification/COI screening).

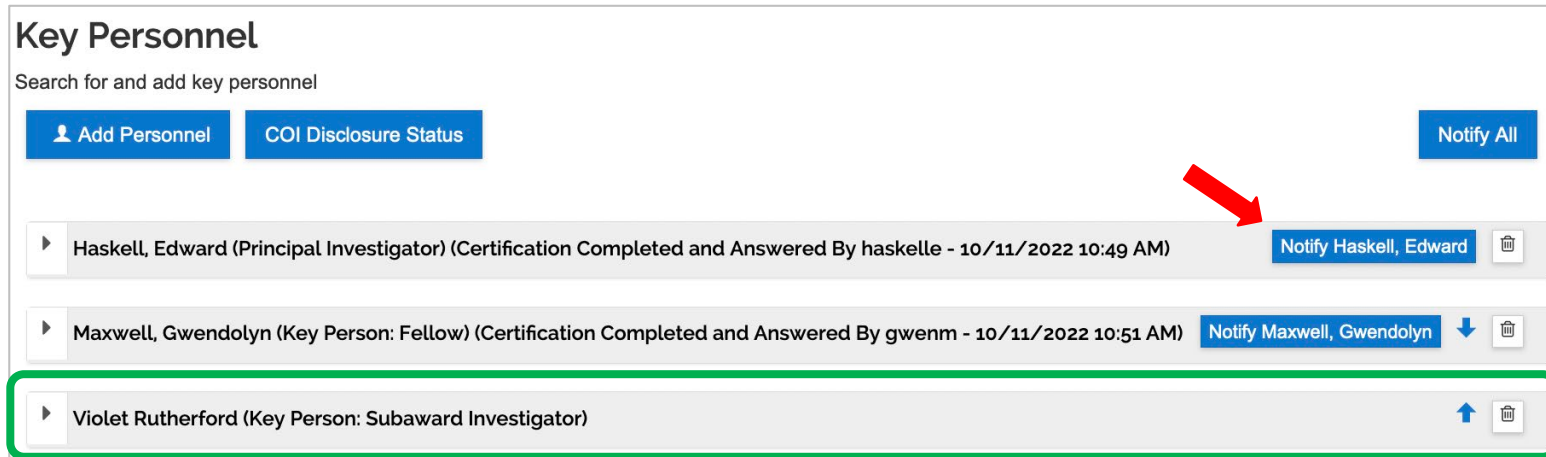


Which of the following should you do next (select all that apply)?

- Assign ***Other Significant Contributor*** role (doesn't require COI/Certification)
- Request a 5-day deadline waiver (proposal will not route on time)
- Request a Sponsored Guest MIT Account
- Remove Peter Plum from the KC Proposal and route the proposal

Key Personnel - Role

Certain key person roles, including ***Other Significant Contributor***, ***Consultant***, and ***Subaward Investigator*** are exempt from COI requirements. ***Notify*** button only displays when required.



Key Personnel
Search for and add key personnel

[Add Personnel](#) [COI Disclosure Status](#) [Notify All](#)

▶ Haskell, Edward (Principal Investigator) (Certification Completed and Answered By haskelle - 10/11/2022 10:49 AM)	Notify Haskell, Edward	
▶ Maxwell, Gwendolyn (Key Person: Fellow) (Certification Completed and Answered By gwenm - 10/11/2022 10:51 AM)	Notify Maxwell, Gwendolyn	
▶ Violet Rutherford (Key Person: Subaward Investigator)		

Note: If a key person external to MIT is required to certify (e.g., KP role “Fellow”), the DLCI must sponsor a guest account through IS&T. Guests complete registration, select a Kerberos, then the DLCI may add them to the KC proposal as an *Employee*.

See [Adding NIH/PHS Investigators & Key Person Certification for Subaward and multi-PI Proposals](#) for general guidance on who should be listed as Investigators/Key Persons and whether certification is required

COI Reference Quick Cards

COI Quick Reference Cards

Proposal Development

Card Topic	Application	Audience
Adding NIH/PHS Investigators & Key Person Certification for Subaward and multi-PI Proposals	Kuali Coeus	Aggregators
Investigator & Key Person Certification: Non NIH/PHS Sponsor Proposals	Kuali Coeus	Aggregators
Principal Investigator Certification Questions	Kuali Coeus	Investigators, PHS(NIH) Key Persons
Certifying Key Persons and Fellows	Kuali Coeus	Investigators, PHS(NIH) Key Persons
Proposal Certification Questions List	Kuali Coeus	Investigators, PHS(NIH) Key Persons

<https://coi.mit.edu/reference-and-user-guides/coi-quick-reference-cards>

MIT Person?	PI/Multiple indicated?	KC Proposal Role	Grants.Gov form Proposal Role	MIT KC Required Certification?	Description
Yes	Either	PI/Contact	PD/PI	Yes	An "Investigator" means the project director/principal investigator and any other person who is responsible for the design, conduct, or reporting of research or instructional activities.
Yes	Yes	PI/Multiple (MIT Employee)	PD/PI	Yes	
No	Yes	PI/Multiple (Non MIT Employee, often Subaward Investigator)	PD/PI	No - Managed by Subaward Organization	
Yes	No	Co-Investigator (MIT Employee)	Co-Investigator	Yes	Individuals who commit to contribute to the scientific development or execution of the project, and DO commit specified measurable effort (i.e., person months) to the project.
Yes	N/A	Key Person Key Person Role: enter role on the project i.e., Senior PostDoc Associate, Research Scientist, etc.	Other Other Project Role Category: [Key Person Role as entered]	Yes	
No	N/A	Key Person Key Person Role: enter role on the project i.e., Senior PostDoc Associate, Research Scientist, etc.	Other Other Project Role Category: [Key Person Role as entered]	Yes (requires DLC to Sponsor Non MIT individual by obtaining an MIT Kerberos ID, which creates an entry in the employee search - see under "To Add Key Persons" below)	
Either	N/A	Key Person Other Significant Contributor Key Person Role: enter Other Significant Contributor (use exact spelling).	Other Project Role Category: Other Significant Contributor	No - this role does not meet qualifications of certification and disclosure requirements	Individuals who commit to contribute to the scientific development or execution of the project, <u>but do not commit any specified measurable effort</u> (i.e., person months) to the project.
No	N/A	Key Person Consultant Key Person Role: enter Consultant (use exact spelling).	Other Other Project Role Category	No - this role does not meet qualifications of certification and disclosure requirements	Individuals who generally provide a 'fee for service' and do not typically conduct research. They may provide insight and expertise to the PI but independently are

Supplemental Information - COI Discl. Req.

Solicitation specific: If a solicitation's COI Disclosure requirements differ from what is typically required by the sponsor, the **Supplemental Information - COI Discl. Req.** must be manually changed.

Fellowships: Proposals with *Fellowship – Pre-Doctoral* or *Fellowship – Post-Doctoral* Activity Type, both the fellow and the faculty sponsor must certify. Fellows are listed as a Key Person. If the Sponsor is in a COI Hierarchy that does not require KP disclosure, the **Supplemental Information - COI Discl. Req.** must be manually changed to include Key Personnel (**PCK**).

Supplemental Information - COI Discl. Req.

User: trainor

Supplemental Info

Document was successfully saved.

Other

Other

ARRA Funding:
select

COI Discl. Req.:
select

MIT Major Initiatives:
select

NSPIRES USER NAME:

Subj to DOE DEC June 2021:
select

Subj to Exec Order 14042:
select

US Manufacturing Plan Req.:
select

Other

ARRA Funding:
select

COI Discl. Req.:
select
N/A - Not Applicable
PC - PI and Co-I (s)
✓ PCK - PI, Co-I and Key Person (s)

MIT Major Initiatives:
select

If the **Supplemental Information - COI Discl. Req** pull-down menu says “Select”, it indicates that no changes were made.

A proposal Aggregator may select:

- **PC** – PI and Co-I(s) (no Key Person COI requirements)
- **PCK** – PI, Co-I(s), and Key Person(s)
- **N/A** – Not Applicable (mechanism to deselect)
- **Supplemental Information - COI Discl. Req** should only be used when the solicitation has COI requirements different than the sponsor typically requires.

Proposal Certification

When PI, Co-I, and/or Key Person are required to certify in a proposal, the Aggregator clicks the **Notify** button and an email with a direct link is sent.

Key Personnel

Search for and add key personnel

 Add Personnel

COI Disclosure Status

Notify All

▶ Cariolo, Ian C (Principal Investigator) (Certification Incomplete)

Notify Cariolo, Ian C



▶ Davis, Andrew (Key Person: Fellow) (Certification Incomplete)

Notify Davis, Andrew



▶ Gold, Alexandra (Key Person: Co-Mentor) (Certification Incomplete)

Notify Gold, Alexandra



Proposal Certification cont'd

REMEMBER: Proposal Certification is not COI, and COI is not proposal certification.

Only when answering YES to either 10, 11, or 12 (the SFI screening questions in the certification) does there become a COI implication at proposal phase.

☐ Yes
☒ No

10. Do you have a Significant Financial Interest in this sponsor? A Significant Financial Interest (SFI) is defined as salary, consulting, or other remuneration of \$5,000 or more, which you have received in the last 12 months, or expect to receive in the next 12 months; or any equity interest in a non-publicly traded company; or stock holdings in a company that is related to your area of research, and exceeds \$100,000. ⓘ

☒ Yes
☐ No

11. Could the work contemplated in this project reasonably appear to affect a company or other organization in which you have a SFI? ⓘ

☐ Yes
☒ No

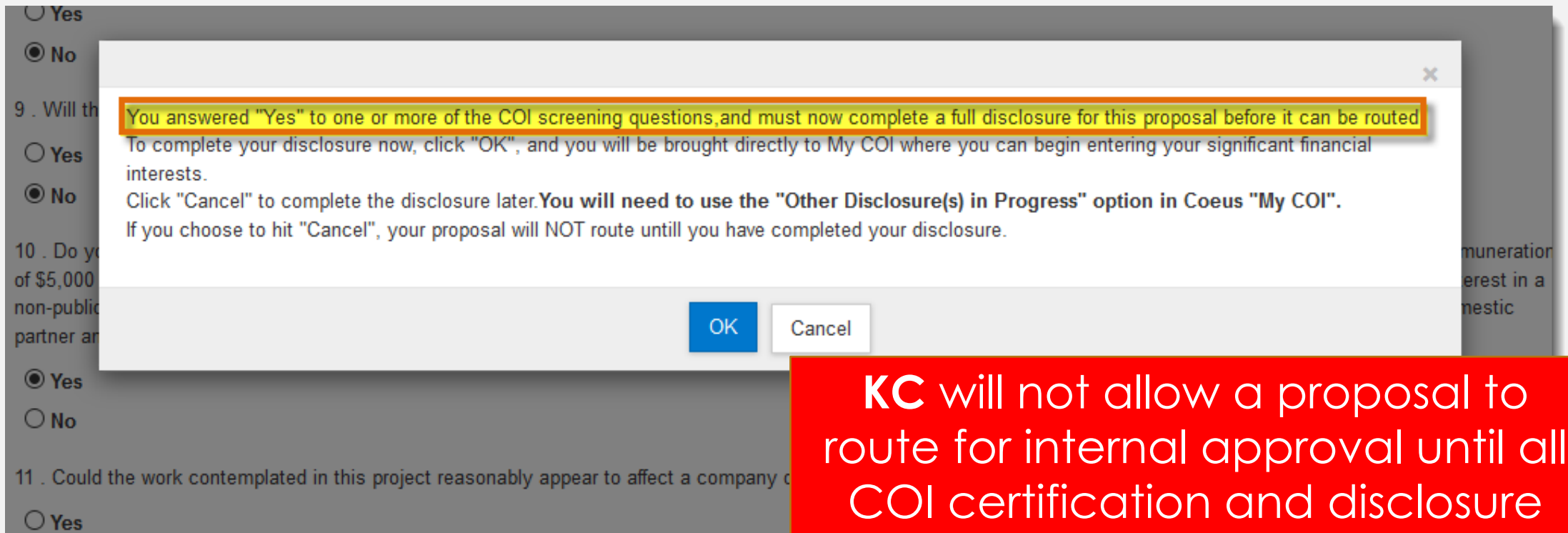
12. Does this project contemplate any purchases from or subawards to a company or other organizations in which you hold a SFI? ⓘ

☒ Yes
☐ No

14. If the sponsor for this proposal is Federal - Have you lobbied, or are you aware of anyone who has lobbied government officials in support of this project? ⓘ

Proposal Certification cont'd

PI/Co-I/KP certifies. If the answer to any of the three COI Screening questions is **Yes**, then the certifier is prompted to complete a COI disclosure.



The image shows a screenshot of a web application with a modal dialog box open. The dialog box has a title bar with a close button (X). The main text inside the dialog is highlighted in yellow. The text reads: "You answered 'Yes' to one or more of the COI screening questions, and must now complete a full disclosure for this proposal before it can be routed. To complete your disclosure now, click 'OK', and you will be brought directly to My COI where you can begin entering your significant financial interests. Click 'Cancel' to complete the disclosure later. You will need to use the 'Other Disclosure(s) in Progress' option in Coeus 'My COI'. If you choose to hit 'Cancel', your proposal will NOT route until you have completed your disclosure." At the bottom of the dialog are two buttons: "OK" (blue) and "Cancel" (white). In the background, parts of a form are visible, including questions 9, 10, and 11, each with radio button options for "Yes" and "No".

☐ Yes
☒ No

9 . Will th

☐ Yes
☒ No

10 . Do y
of \$5,000
non-public
partner an

☒ Yes
☐ No

11 . Could the work contemplated in this project reasonably appear to affect a company c

☐ Yes

muneration
erest in a
nestic

KC will not allow a proposal to route for internal approval until all COI certification and disclosure requirements are met.

MyCOI – MIT's COI disclosure module

 CoeusLite

User: Cariolo, Ian C

[Current Location](#)

[Coeus Home](#) **My COI** [Logout](#)

[Help](#) | [MIT COI Policy](#) | [Travel](#) | [Awards On Hold](#) | [With Entities](#) | [No Entities](#) | [WIP](#) | [In Progress](#) | [Search](#)

Disclosure View

Step One

✓ [Screening Questions](#) >>

Step Two

✓ [Significant Financial Interests](#)

Step Three

[Relationships](#)

Step Four

[Certify](#)

[Proposal Questions](#)

[MY COI Home](#)

Financial Disclosure by Cariolo, Ian C

Name :

User Name :

Department : 391020:Research Administration Support

Phone :

Faculty : No

Email :

Expiration Date : 03/09/2023

Screening Questions

Significant Financial Interests

Relationships

Certify

For your project listed below, please answer the certification questionnaire: [Help](#)

Proposal # : 00061248

Title : IAN TEST - 15% U/R

Start Date : 01-Mar-2022

End Date : 28-Feb-2023

If you need to make corrections to these answers please use the [Proposal Questions](#) link available in the left navigation menu.

Disclosure: Screening Questions

Please Answer the Following Questions:

1.

Do you have a Significant Financial Interest in this sponsor? A Significant Financial Interest (SFI) is defined as salary, consulting, or other remuneration of \$5,000 or more, which you have received in the last 12 months, or expect to receive in the next 12 months; or any equity interest in a non-publicly traded company; or stock holdings in a company that is related to your area of research, and exceeds \$100,000.

☒ Yes ☐ No

2.

Could the work contemplated in this project reasonably appear to affect a company or other organization in which you have a SFI?

☐ Yes ☒ No

3.

Does this project contemplate any purchases from or subawards to a company or other organizations in which you hold a SFI?

☐ Yes ☒ No

[Continue](#)

Proposal Certification cont'd

When in doubt, as the Aggregator of the proposal, you have the ability to see the certification answers.

Key Personnel

Search for and add key personnel

[Add Personnel](#)[COI Disclosure Status](#)[Notify All](#)

Cariolo, Ian C (Principal Investigator) (Certification Completed and Answered By icariolo - 01/30/2023 02:18 PM)

[Notify Cariolo, Ian C](#)

1

[Details](#)[Organization](#)[Extended Details](#)[Degrees](#)[Unit Details](#)[Person Training Details](#)

2

PI Proposal Certification Questions

PI Proposal Certification Questions

[Clear All Answers](#)

1 . Is your current space sufficient to carry out this project, and those already proposed? 

☒ Yes

☐ No

2 . Do you plan to carry out part of this work in any space other than that of the department, lab or center submitting this proposal? 

Certification Complete vs. COI Disclosure Incomplete

To determine whether or not the Key Person(s) has completed a disclosure, one can check within the proposal via the COI Disclosure Status button:

Proposal Development
Proposal: #51707
PI: *Cariolo, Ian C*

① Important Policy Info ✓ Data Validation (on) Print

Key Personnel

Search for and add key personnel

COI Disclosure Status

Full Name	Proposal Person Role Id	COI Disclosure Status
Cariolo, Ian C	PI	Not Disclosed

Close

Personnel

- ✓ Compliance
- Attachments
- Questionnaire
- Budget
- Access
- Supplemental Information

▶ Cariolo, Ian C (PI/Contact) (Certification Completed and Answered By icariolo - 01/30/2023 02:12 PM) **Notify Cariolo, Ian C**

▶ Trainor, Carole (Co-Investigator) (Certification Incomplete) **Notify Trainor, Carole**

▶ Mann, Kimberly (Key Person: Other Significant Contributor)

Validation

Q: If I've received an email from KC that all certifications are complete, why is the KC proposal validation telling me that the Disclosure is not completed?

A: The email you receive from KC is only attesting to the certification questions having all been answered. The act of completing a proposal COI disclosure is a separate action outside of KC.

Data Validation

Turn Off

Show

10

 entries

Search:

Area	Section	Description	Severity	Actions
Error				
Personnel		Disclosure not completed.	Error	Fix It

Showing 1 to 1 of 1 entries

[Previous](#)[Next](#)

Close

Proposal Aggregator (DLCI) Notifications

- The proposal Aggregator receives email notification when all the Key Personnel have certified.
- Email notification does not provide information on COI Disclosure status (KC validation indicates if COI disclosure is required for submission to route for internal approval).

SFI Flag at Proposal and Review

When a PI/Co-I/KP certify in a proposal that they have an SFI, the CAs see the flag in KC during Proposal Review on the *Summary* screen and notify Jeff and Rupinder.

Submit

⚠ This page has 5 warnings

- Use of human subjects:(PI) Haskell
- Restricted access or use for some researchers:(PI) Haskell
- Part of project performed outside US:(PI) Haskell
- Will ship outside the US:(PI) Haskell
- Related SFI Identified:(PI) Haskell ←

Saved

Routing

Approved

[Proposal Summary](#) [Personnel](#) [Compliance](#) [Attachments](#) [Questionnaire](#) [Supplemental Info](#) [Budget Summary](#)

Personnel

Print All

Key Person	Role	Unit	Proposal Person Certification
Haskell, Edward	Principal Investigator	(Lead Unit) 150001 - Center for KC Training 152000 - Chemistry	complete (view)

Initial Award Setup

New Award is set up in **Hold** while reviewed for compliance, including COI disclosure or CITI COI training (if required by sponsor).

MIT Conflict of Interest Officers contact the PI/Co-I and Lead Unit with instructions for completing COI and training requirements.

MIT Account Number: 6123456
PI: Haskell, Edward
Page: 1
Date: 10/07/2021

Massachusetts Institute of Technology

Notice of Award - Hold Notice

Account Number 6123456 Award Number: 032222-00001 Sequence: 1 **Status: Hold**

Modification Number:

Sponsor Award Number: INV-54321

Sponsor: 006012 - Bill & Melinda Gates Foundation

Prime Sponsor:

Title: Exploring use of cocoa bioactives for short-term memory enhancement

Holds for this award

Disclosures for this award	Investigator	Role	Disclosure	Training
	Haskell, Edward	Principal Investigator	No Disclosure	Training Not Required

- This Award has a special review of Human Subjects with Status of Pending, So Award Status should be Hold.
- PI/COI need to complete their disclosures.

Printing the Notice of Award from KC

Award Contacts Commitments Budget Versions Payment. Reports & Terms Compliance Supplemental Info Comments, Notes & Attachment **Award Actions** Medusa

Document was successfully reloaded.

time & money Award Budget expand all collapse all

Click Show

Print

Print	☒ Terms & Conditions ☒ Compliance ☒ Approved Equipment ☒ Approved Foreign Travel ☒ Approved Subawards ☒ Cost Sharing ☒ F&A Rates ☒ Benefits Rates ☒ Flow Thru ☒ Comments ☐ Funding Summary ☐ Hierarchy Distributions ☒ Technical Reports ☒ Reports ☒ Payment ☒ Closeout ☒ Sponsor Contacts ☒ Other Data ☒ Keywords		
Award Notice	select all select none		
Award Modification	Award Version: 8	Transaction: 519656	Signature Required: ☐ print
Award Hierarchy			print
Time & Money History			print
Time & Money Transaction Detail	Award Version: 8	Transaction: 519656	print

Route Log

Notifications

Award: Supplemental Information

If the **Supplemental Information - COI Discl. Req** menu was used to select solicitation specific COI requirements, the selection will display in the Award. If it says "Select", changes were not made.

Other	
Full Group Name: Other	
3K Equipment Period Ended:	
3K Equipment Threshold:	select
ARRA Funding:	select
ARRA Program Source (TAS):	
ARRA Sponsor DUNS:	
Billing Element:	select
COEUS_AAA_AWARD_NUMBER:	
COI Discl. Req.:	PCK - PI, Co-I and Key Person (s)
COVID-19 Funding:	select
FedFrngGovTalentRecruitPrgmReq:	select
Limited Use Child:	select
MIT Major Initiatives:	select

COI Discl. Req options:

- **PC** – PI and Co-I(s) (no Key Person COI requirements)
- **PCK** – PI, Co-I(s), and Key Person(s)

Professor Hector J. Peabody is scheduled to present at a conference in Vienna. His annual COI disclosure is due. He asks if you can complete it for him (he is too busy). You should (select all that apply):

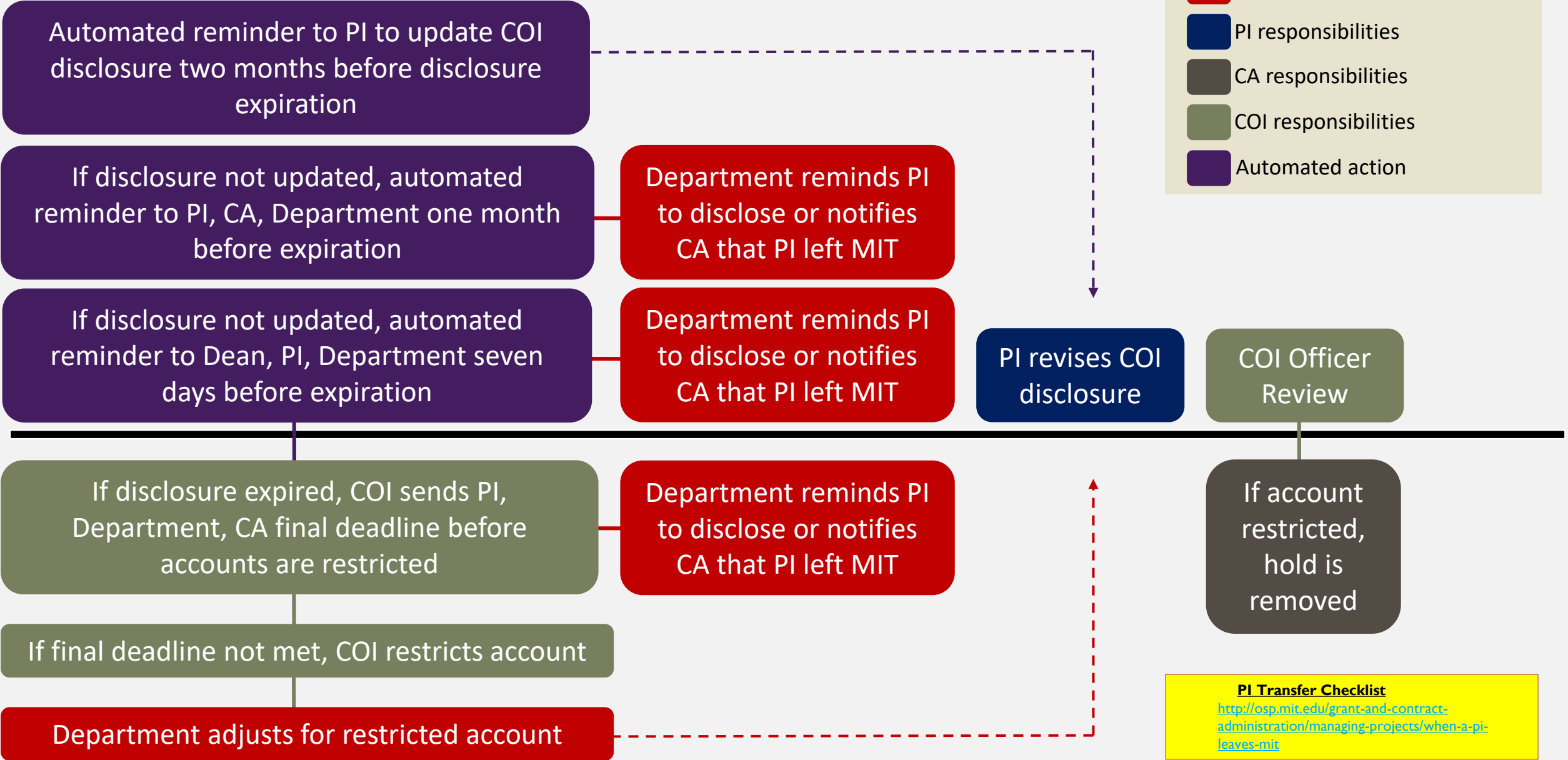
- A. Ask him for documentation so it is accurate and complete
- B. Contact coi-help@mit.edu for delegate access
- C. Explain that the disclosure must be completed by him



COI Annual Disclosure Updates

Legend

- Department responsibilities
- PI responsibilities
- CA responsibilities
- COI responsibilities
- Automated action



Expiration Reports Available on the COI Website: a great tool for monitoring & compliance

Expiring Disclosures—PI:

- Search by entering one PI's full name. Useful when someone asks, "When does Dr. Wu's disclosure expire?"

Expiring Disclosures—School

- Shows all PIs by the school that comprises their DLCI. Can be further refined by DLCI

Expiring Disclosures—CA, DLC

- Sorted by CA, then DLCI. **This report also shows the account number and title of the award** which will be affected if the COI disclosure expires.

Expiring Disclosures—DLC

- Shows all PIs filtered by DLCI.

Expiration Report at coi.mit.edu



Office of the
Vice President for Research

Financial Conflicts of Interest in Research

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Specific
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COI Disclosure?

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[Home](#) / [Help and Training](#) / COI Disclosure Expiration Reports

COI Disclosure Expiration Reports

To view the reports **sign in via the Tableau Server** - scroll down and to the right until you find the blue "Sign in to Tableau Server" button.

Please note that access to these reports is restricted and requires an MIT certificate. If you have questions specifically about the COI disclosure process or the results returned, please email coi-help@mit.edu. If you are experiencing technical issues (i.e. page errors, access issues, results not displayed, etc), please email kc-help@mit.edu and provide a screen shot or description of what you are experiencing so we can better assist you.

Depending on your screen size and resolution, you may need to scroll to the right to view the full report.

There are four different reports you can access by clicking on the appropriate tab below. You can search the reports by Principal Investigator (PI) name, by the DLC where the PI has active awards, by the School where PIs have active awards or by the Research Administration Services (RAS) Contract Administrator name. An explanation of each report is provided when you click on the tab.

[Report - by PI](#) [Report - by DLC](#) [Report - by School](#) [Report - by RAS CA](#)

MIT Research Administration Services

COI Expiring Disclosures by PI

This report shows a table with the number of days until the COI disclosure expiration date for the selected PI(s), along with their contact information, home unit, and the account number(s) and project title(s) associated with their research.

Undo Redo Replay Revert Refresh Pause



Expiration Report at tableau.mit.edu

>

Explore / VPR Reports for MIT / COI Expiring Disclosures Report / COI Expiring Disclosures

Search for views, metrics, workbooks, and more



COI Expiring Disclosures

☆ ⓘ ⋮

Owner **Amy L Cocchiarella** Modified Feb 6, 2023, 9:09 AM Extract Feb 6, 2023, 9:09 AM

Views 4

Data Sources 1

Connected Metrics 0

Custom Views 0

Extract Refreshes 1

Subscriptions 0

Select All

Sort By: Sheet (first-last) ↑ ▾

⌵

MIT Research Administration Services

COI Expiring Disclosures by PI

This report shows a table with the number of days until the COI disclosure expiration date for the selected PI(s), along with their contact information, home unit, and the account number(s) and project title(s) associated with their research.

Report - by PI ☆ ⋮

MIT Research Administration Services

COI Expiring Disclosures by DLC

This report shows a table with the number of days until the COI disclosure expiration date for the PI(s) associated with the selected DLC(s), sorted by PI last name, and also displays their contact information, home unit, and the account number(s) and project title(s) associated with their research.

Report - by DLC ☆ ⋮

MIT Research Administration Services

COI Expiring Disclosures by School

This report shows a table with the number of days until the COI disclosure expiration date for the PI(s) associated with the selected School(s). It is sorted by DLC name, and then PI last name, and also displays the PI's contact information, and home unit.
The DLC Name Filter can be used to show a specific DLC within the selected School. The DLC dropdown list will populate based on the School selected.

Report - by School ☆ ⋮

MIT Research Administration Services

COI Expiring Disclosures by RAS CA

This report shows a table with the number of days until the COI disclosure expiration date for the DLC(s) associated with the selected RAS CA. It is sorted by DLC name, and then PI last name, and also displays the PI's contact information, home unit, and the account number(s) and project title(s) associated with their research.

Report - by RAS CA ☆ ⋮

Expired disclosures: Next steps

- If disclosure expires, last ditch effort to round up the PI are made, an e-mail is sent indicating the accounts to be restricted and the date on which the restriction will be made active
- DLCIs should work with RAS CA to transfer, terminate, change PI on active awards as per the **PI Transfer Checklist**
- <https://ras.mit.edu/document/exiting-faculty-checklist-2017-03-06>

Failure to report changes of Investigator/Key Person to Sponsor is a critical compliance issue.

	COI Notification sent:	Sent to:
1.	60 days - COI disclosures expire in two months	PI
2.	30 days - COI disclosures expire in one month	PI, cc to AO and CA
3.	30 days - Conflict of Interest disclosures scheduled to expire in one month (summary list)	AO, cc to CA
4.	7 days - COI disclosures expire in 7 days	PI, cc to AO, CA
5.	7 days - COI disclosures expire in 7 days (summary list)	Assistant Dean

Expired disclosures: Next steps cont'd

IMMEDIATE ACTION REQUIRED: COI disclosures expire in 7 days on February 07, 2023



○ Coeus.Application@MIT.EDU <Coeus.Application@MIT.EDU>

To: [redacted] Cc: [redacted]; coi-help [dropdown arrow]

****Please do not reply to this system-generated Email. Please use coi-help@mit.edu for questions about this notice.****

Dear [redacted],

You are receiving this message because you are an Investigator or key person with active awards or pending proposals from Sponsors that require a valid financial conflict of interest (COI) disclosure for the life of the award. Your current COI disclosure will expire in the next 7 days on February 07, 2023 therefore we request that you follow the instructions below to keep your disclosure valid. FAILURE TO COMPLY WITH THIS REQUIREMENT WILL PUT THE AFFECTED ACCOUNT(S) IN "RESTRICTED" STATUS AND FUTURE CHARGES WILL NOT BE ALLOWED. In some cases we are required to report this delay in disclosure to the sponsor.

To see which of your active awards/accounts will be impacted by an expired COI disclosure, please click here:
<https://coi.mit.edu/help-and-training/coi-disclosure-expiration-reports>

If the award(s) have expired or you are no longer involved with the project(s), please notify us of these changes by hitting "reply all" to this message, otherwise, please follow the instructions below to update and submit your disclosure.

BEFORE YOU BEGIN:

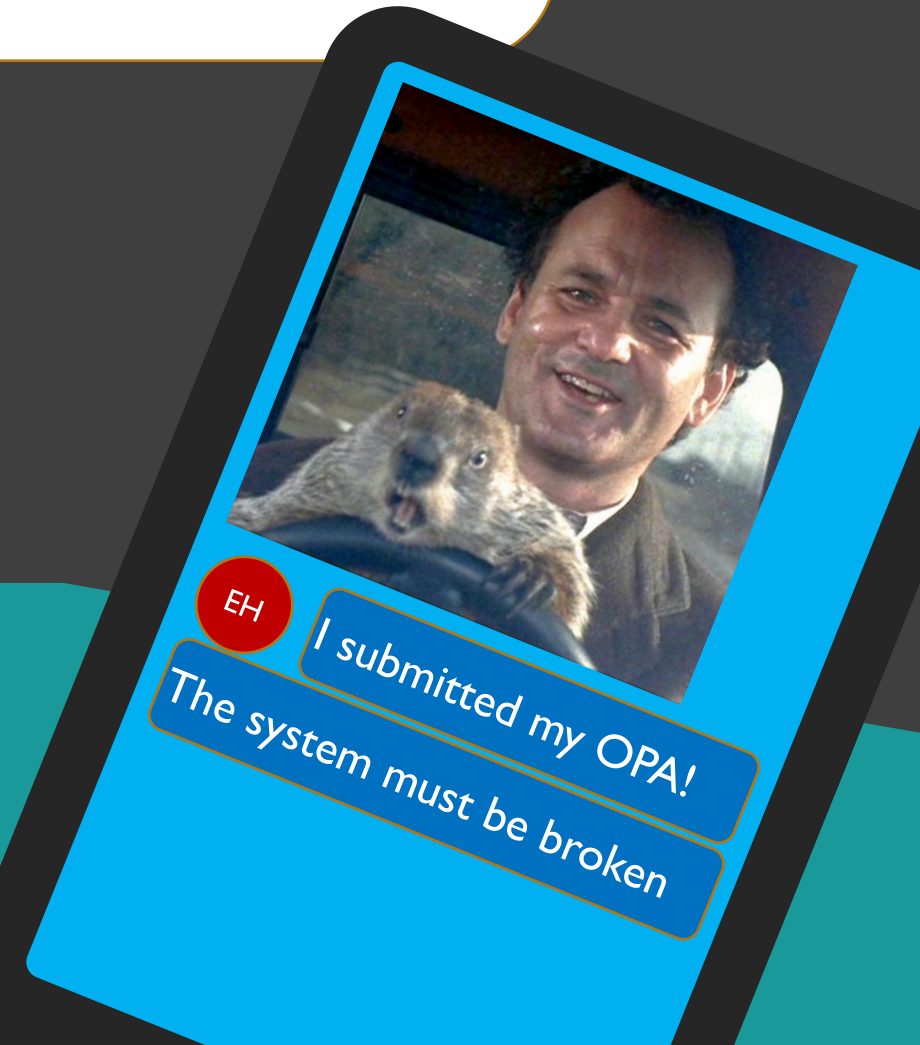
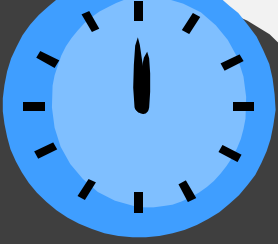
1. Access to the COI module is made possible by logging in via [Touchstone](#), followed by [DUO](#). If you have technical difficulties logging in with Touchstone or Duo or experience any connectivity issues, please contact: servicedesk@mit.edu.
2. Read the updated Financial Conflict of Interest in Research policy at <http://coi.mit.edu/policy>. You will be asked to certify that you have read the policy during the disclosure process. COI Policy and Process questions should be sent to coi-help@mit.edu.

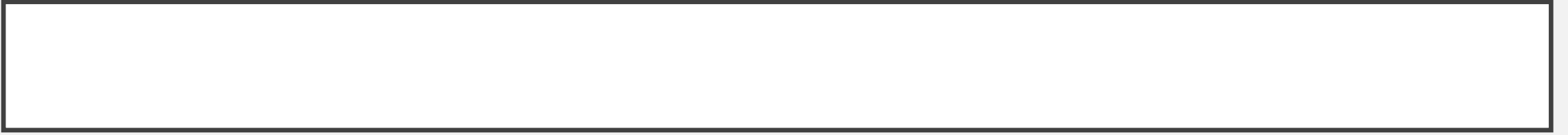
INSTRUCTIONS FOR UPDATING YOUR DISCLOSURE:

1. Click on https://coeus.mit.edu/coeus/coi.do?Menu_Id=004 which takes you to the My COI landing page.
2. Under the "Revise" column, choose "Master Disclosure". If the "Master Disclosure" button is grayed out (not clickable) it means you have a disclosure in progress so please click on the "Other disclosures in Progress" button

Professor Haskell has received 4 reminders that his annual COI disclosure is due (now due in 5 days). He tells you that he submitted his OPA. You should:

- A. Contact coi-help@mit.edu and explain that Haskell submitted disclosure
- B. Wait and see if the accounts go into restricted status
- C. Explain that OPA is a separate reporting tool and he must follow instructions in the email reminder





If you have COI questions during pre- or post-award, please reach out to your **Contract Administrator**.

Feedback

We are providing a **QR Code** for you to access a **RAS-ED feedback survey** via your phone or mobile device.



Use the link below to access the form via the web:
https://mit.co1.qualtrics.com/jfe/form/SV_a5cVa01GABQnYTc

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Helpful Resources

- COI Questions/help: coi-help@mit.edu
- Online COI resources: www.coi.mit.edu