1.0 INTRODUCTION

This document describes use of the web-based Financial Conflict of Interest (FCOI) disclosure tool at The University of Toledo. It is intended for all employees (faculty and staff), students, and volunteers affiliated with the University who are responsible for the design, conduct, or reporting of research that is funded by external sponsors, as required by University policy and Federal regulations.

2.0 LOGGING IN

1. Use a supported web browser to open: https://coi.utoledo.edu

2. Use your UTAD credentials (user name and password) to log on to the site (Figure 2.1).

3. Logging on to the site successfully brings you to the Entry page (Figure 2.2).

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Figure 2.1. COI tool Login page.

Figure 2.2. COI tool Entry page.
3.0 DESCRIBING YOUR EXTERNAL FINANCIAL INTERESTS

New users of the COI Disclosure tool who have external financial interests to report begin their disclosure of external financial interests to the University by creating a list of external financial interests. External financial interests that need to be disclosed are described under the [More Information] button on the COI site Entry page (Figure 2.2), in Appendix A of this document, and in the University COI Policy.

If you have no external financial interests that are reasonably related to your institutional duties at the University, continue to Section 4.0, Creating Your Disclosure of External Financial Interests.

1. Begin entry of your external financial interests by selecting the [Review/Update My Financial Interests] button on the site Entry page (Figure 2.2).

2. On the My Financial Interests page, select the [Add New Financial Interest/Entity] button (Figure 3.1).

3. Your disclosure identifies the source of your external interest as a financial entity. The COI Disclosure tool identifies external entities from searchable lists of research sponsors and prior disclosures. The entity of your new financial interest is selected by searching these existing lists of known financial entities. On the Add a New Financial Interest page, select the [Find Entity] button to search for and select an existing financial entity for this new financial interest (Figure 3.2).
4. On the Search for a Financial Entity page (Figure 3.3), enter one or more entity name key words of your new financial interest in the Name field and select the [Search for Entity] button.

A useful strategy for searching existing financial entity names, which may not match their official forms, is to enter fewer words of the name initially. For example, if your external financial interest is with Johnson & Johnson Services, Inc., you should begin your search with keyword “Johnson”.

5. Entity search results are reported in two lists (Figure 3.4); if you find the entity in one of these lists, choose the entity by selecting the Select This link in the right column of its entry.
If your financial entity is not found in either search result list, you will need to add the entity to the COI database. Refer to Appendix B to create a new financial entity record.

6. After selecting an entity from a search result list, you will be returned to the *Add a New Financial Interest* page with the *Entity Name* field populated (Figure 3.5).

![Figure 3.4](image1.png)

**Figure 3.4.** *Search for a Financial Entity* page with results on key word “test”.

![Figure 3.5](image2.png)

**Figure 3.5.** *Add a New Financial Interest* page with *Entity Name* populated.
Complete the remaining fields of your new external financial interest, including:

a. *Relationship*: Self; Spouse; Dependent Child (from drop-down menu).
b. *Interest Amount*: Dollar amount of interest (from drop-down menu).
c. *Interest Type*: Consulting Fees; Equity; Honoraria; Invention Income; Paid Authorship; Salary; Travel Reimbursement; (from drop-down menu).
d. *Begin Date*: Date your financial interest started.
e. *End Date*: Date your financial interested ended (if not an ongoing interest).
f. *Description*: Additional remarks to fully describe your interest to University COI administrators tasked with evaluating COI related to your research activities. While this is not a required field, the Office of Research and Sponsored Programs encourages investigators to not leave this field empty.

Select the [Save] button to enter your new external financial interest to the COI database.

7. If you, your spouse, or dependent children, have more than one financial interest with the same entity (*e.g.*, you own shares of a company in an investment account that you control directly and you were reimbursed by the same company for travel to a sponsored conference last year), you are required to list these as separate financial interests of the appropriate type (*e.g.*, equity and travel reimbursement).
4.0 CREATING YOUR FIRST DISCLOSURE OF EXTERNAL FINANCIAL INTERESTS

When your list of external financial interests to be disclosed is complete (including no external financial interests), you can create your COI Disclosure. Your COI Disclosure to the University includes your list of external financial interests and an electronic signature that certifies that the information included in your disclosure is correct. Your COI Disclosure to the University is valid for one (1) year from the date of your disclosure is certified.

1. From the COI Disclosure tool Entry page, select the [My COI Disclosure] button (Figure 2.2). If this is your first disclosure and you have no external financial interests, you will be presented with the This is your first Disclosure page as shown in Figure 4.1.

![Figure 4.1](Image 144x473 to 504x568)

**Figure 4.1.** This is your First Disclosure page with no external interests.

If you have no external financial interests to disclose to the University, select the [I have nothing to disclose] button.

2. If you entered new external financial interests, the COI Disclosure tool will present you with the This is your first Disclosure page with a list of your external financial interests (Figure 4.2).

![Figure 4.2](Image 144x473 to 504x568)

**Figure 4.2.** This is your first Disclosure page with external financial interests.

If the list is correct, select the [I certify that this disclosure is complete] button to submit your disclosure of external financial interests to the University.

In both cases, your new disclosure to the University is valid for one (1) year from the date your disclosure is certified.
5.0 UPDATING YOUR EXTERNAL FINANCIAL INTERESTS

University policy and Federal regulations require that you update your disclosure of external financial interests within 30 days when the value (amount) or end date of an external financial interest changes.

1. From the Entry page, select the [Review/Update My Financial Interests] button to review your current list of external financial interests (Figure 2.2).

2. On the My Financial Interests page, select the “View/Edit” link for the interest that requires updating (Figure 5.1).

3. On the Edit Financial Interest page (Figure 5.2), change the field(s) that require updates.

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**Figure 5.1.** My Financial Interests page with current list of interests.
The Office of Research and Sponsored Programs recommends that you offer a brief remark in the *Description* field regarding this update to your external financial interest. When your new information is correct on the *Edit Financial Interest* page, select the [Save] button to submit your changes to the COI database.
6.0 Recertifying Your Disclosure

When you add a new external financial interest or your current disclosure expires, your disclosure to the University must be renewed (recertified) as required by University policy and Federal regulations. You can also renew your disclosure within 30 days of its expiration. Your (recertified) disclosure is valid for one (1) year from the date it is recertified.

1. Select the [My COI Disclosure] button on the COI tool Entry page (Figure 2.2).

2. On the My COI Disclosure page, select the “View/Certify” link in the Action column (Figure 6.1).

3. If your pending or expired disclosure has no external financial interests, your Certify My COI Disclosure page will show this status (Figure 6.2).

4. Pending or expired disclosures that have associated external financial interests will list current external financial interests on your Certify My COI Disclosure page (Figure 6.3).
Figure 6.3. *Certify My COI Disclosure* page with external financial interests.

If your list of external financial interests is correct, select the *[I certify that this disclosure is complete]* button to submit your updated/renewed disclosure to the University. Your renewed disclosure is valid for one (1) year from the date it is recertified.
APPENDIX A
What Financial Interests Do I Need to Disclose to the University?

Your disclosure of external financial interests to the University is based on your institutional duties – i.e., what work and/or research you do at the University. For example, if you work in the life sciences and you have a financial interest with an organization that is involved in the life science field, the University expects you to disclose this external financial interest, regardless of its value.

In general, you are required to report financial interests from external entities (i.e., not from the University) that are held by you, your spouse, or your dependent children that can reasonably appear to be related to your institutional duties at the University including, but not limited to:

- Salary or other payments for services (e.g., consulting fees or honoraria) from external entities, except as noted below
- Current and on-going equity interests, including but not limited to stocks, stock options, and ownership interests in any amount, except as noted below.
- Intellectual property rights and interests (e.g., copyrights, patents, and royalties) paid directly from external entities.
- Travel reimbursed or sponsored by external entities, except as noted below.

Exceptions to the disclosures rules include:

- Any and all payments received directly from the University, such as salary, stipends, and royalties paid for licensing intellectual property rights. Payments received from the University are not considered external, regardless of their original source or sponsor.
- Income from mutual funds and/or retirement accounts for which you do not control the fund investment decisions.
- (1) Income from seminars, lectures, or teaching engagements; (2) income from service and advisory or review panels; and (3) travel that is reimbursed or sponsored by any of the following entities:
  - U.S. Federal, state, and local government agencies;
  - U.S. higher educational institutions as defined by 20 USC 1001(a); or
  - Academic teaching hospitals, medical centers, or research institutes that are affiliated with U.S. institutions of higher education.
APPENDIX B
Creating a New External Financial Entity

In cases where the COI Disclosure tool does not contain a record for the entity associated with one of your external financial interests, you are encouraged to enter new external entities, as needed. The Office of Research and Sponsored Programs expects users of the COI Disclosure tool to avoid entering duplicate records for external entities by searching the existing database prior to creating new entity records.

1. From the Add a New Financial Interest page (Figure 3.2), select the [Find Entity] button.

2. From the Search for a Financial Entity page (Figure B.1), enter one or more entity name key words in the Name text field and select the [Search for Entity] button.

   ![Figure B.1. Search for a Financial Entity page.](image)

The COI tool will search for the key words in the RSP (research) and COI (disclosures) databases and present results in separate lists on the updated Search for a Financial Entity page.

If the intended external entity name is not found on the Search for a Financial Entity page, select the [Entity Not Found] button to add the new entity name to the Disclosures list.
3. On the Add a New Entity page (Figure B.2), enter information for the new external entity record:
   a. Entity Full Name
   b. Entity Short Name/Abbr. (can be the same as the Entity Full Name)
   c. Entity Type (choose from the drop-down list)
   d. Website URL
   e. Traded On (for businesses, from drop-down lists)
   f. Traded As (for publically traded businesses, stock symbol)

![Add a New Entity page.](image)

Select the [Save] button to create the searchable external entity record.

4. On the Search for a Financial Entity page, enter the name of the external entity that you created in (3), above (Figure B.3).

![Search for a Financial Entity with a result.](image)

5. Choose the new external entity from the Disclosures list by selecting the Select This link.

6. You will be returned to the Add a New Financial Interest page where you can complete entering information for your new disclosure (Figure 3.5).