This guide will walk you through the process of disclosing your financial interests to the University of Toledo. Everyone employed by or closely affiliated with the University of Toledo who is responsible for the design, conduct or reporting of research supported by any sponsor or Sponsored Programs agreement is required to file a disclosure electronically using this web application.

I. Logging In
   a. Open a web browser and go to https://coi.utoledo.edu
   b. Use your regular UTAD id and password to log into the site.
   c. Read the general information and instructions. UT Policies are listed as links and will take you out of the application. You can view basic definitions by clicking the underlined terms.
   d. Upon Login, you will be taken to the Entry page which contains information on the COI policies for the federal regulations as well as UT’s policy. These are summarized on the page but links to the actual policies are provided at the bottom of the page. Please review what needs to be disclosed and when before you proceed.
The steps to completing a Disclosure are:

1. Enter and/or review all Financial Interests by clicking on the "My Financial Interests" button. This will allow you to define the relationships and interests you hold with companies or financial entities which fall under the description of "Significant Financial Interests" as defined by the UT policy below. If you have no Financial Interests, or have no changes to your current list of Financial Interests, you can skip to step 2.

   My Financial Interests.

2. This is your first disclosure. You must create an Annual Disclosure before creating any additional disclosures. Create an Annual Disclosure by:
   A) clicking the "My Disclosures" button below, and
   B) certifying that you have no Financial Interests or that the Financial Interests listed are up to date.

   My Disclosures.

Please note: Everyone who is governed by the UT Policy on FCOI must have at least one Annual Disclosure, even if you have no Significant Financial Interests.

In what time frame must a Disclosure be created or updated?
There are two kinds of Disclosures:

   (1) Annual Disclosure
   An Annual Disclosure is a document containing all your current financial interests and 'signed' by you electronically attesting that those financial interests are up to date. It must be re-signed once per year OR in the event of a change in your Significant Financial Interests.

   (2) Event-Based Disclosure
   An Event-Based Disclosure is a document that is tied to a specific proposal, project or study. It contains current Financial Interests that you designate as potential Financial Conflicts of Interest as defined in the UT Policy and your electronic signature attesting that those Financial Interests are up to date.

   The Event-Based Disclosure must be created or re-certified:
   (a) no later than the time of application for funded research.
   (b) at least annually, during the period of the award; and
   (c) within thirty (30) days of discovering or acquiring (through purchase, marriage or inheritance) a new Significant Financial Interest.

What needs to be disclosed?
ANY Significant Financial Interest held by yourself, a spouse, child or other family member or close friend including but not limited to:

   • Remuneration from a publicly-traded corporation or entity in the past 12 months such as consulting fees, honoraria, or paid authorship in any amount.
   • Equity interests in a publicly-traded corporation or entity including stocks, stock options, or other ownership interests, which exceeds $5,000 when aggregated.
   • Remuneration received from a non-publicly-traded corporation or entity in the past 12 months such as consulting fees, honoraria, or paid authorship which exceeds $5,000 when aggregated.
   • Equity interests in a non-publicly-traded corporation or entity including stocks, stock options, or other ownership interests in any amount.
   • Income related to intellectual property rights such as patents or copyrights.
   • Reimbursed or sponsored travel (except by government entities or higher educational institutions). See additional instructions pertaining to entry of reimbursed or sponsored travel.

What doesn’t need to be disclosed?

   • Income from mutual funds or retirement accounts for which you do not control the investment decisions.
   • Remuneration paid by this institution such as salary or royalties including intellectual property rights.
   • Income from seminars, lectures or teaching engagements sponsored by a government entity or institution of higher education.

Links to Policies
University of Toledo Financial Conflict of Interest Policy for Sponsored Programs
CITI Program
Federal Policies
42 CFR 50.604 Responsibilities of Institutions regarding Investigator financial conflicts of interest.
42 CFR 50.605 Management and reporting of financial conflicts of interest.
Subpart F-Promoting Objectivity in Research
Return to top.

I'm done, Log out.
II. Creating a Financial Interest

The first step to completing the required disclosure is to create a master list of all your Financial Interests. Please carefully read and understand what constitutes a Financial Interest by referring to the description on the Entry page as well as the official policy. Remember that a Financial Interest could be a Financial Conflict of Interest with your institutional responsibilities as well as any specific research so use a broad view when deciding the scope of what might need to be disclosed.

a. Click on the “My Financial Interests” button on the main Entry page.

b. Click the “Add New Financial Interest/Entity”

c. The University of Toledo has an extensive list of the companies and corporations we have done business with and research for in the past as well as a list of companies already utilized in the Disclosures application. We require that you search these entities first to avoid duplication. Click the “Find Entity” button.
d. Enter a portion of the Entity Name in the Name text field. You do not need to enter the entire name here. For example, if you are searching for “Johnson and Johnson” Just enter “Johnson” for the search. Click the “Search for Entity” button.

e. Your search results will come back in two lists. If you see the entity you are looking for in either list, click the “Select This” link to the far right of the entity you want. **NOTE: If you cannot find the entity you are**
looking for, click the “I can’t find the Entity I need” button at the bottom of the screen, skip to the section on “Creating a Financial Entity”.

f. You will be redirected back to the Add screen where the Entity you chose (or created) is now listed in the Entity Name field.
g. Complete the other fields relating to this Financial Interest. Note that the most common type of interest is Equity, which is usually an ongoing interest. If you have an interest that was limited to a certain time frame, you will need to un-check the “Ongoing Interest” checkbox in order to enter the end date of that interest. This is important because interests that ended prior to 3 years ago no longer need to be applied to any of your Disclosures. For example, if you received a one-time “Travel Reimbursement” over three years ago, it is not necessary to report it. If it was two years ago, you should report it, but after one more year it will no longer be listed among your current interests on disclosures.
h. You will need to create one Financial Interest entry for each type of Interest you hold with that Entity. For example, if you own stock in the entity, and also reimbursed by them for your travel to a speaking engagement last year, that would be two entries, one with a type of “Equity” and one with a type of “Travel Reimbursement”.
i. Once you have completed all required fields, you are welcome to make comments or clarifications in the Description text area. This is very important to the COI committee and should be used to clarify the interest especially in cases where the interest is very small or of limited duration. This comment area will help the COI committee determine if further inquiry leading to a management plan is necessary.
j. When the entry is complete, click the “Save” Button.
You are returned to your list of Financial Interests with the ability to add another interest for that same entity (to save you the time of searching to find the entity again) or create a new financial interest for a different entity.

You also will need to create entries for any Financial Interests (again, one entry per type) held by family members, domestic partners or close friends as defined in the UT Policy.
m. This also is where you will come to update any financial interests that change over time, such as purchasing more stock and thus increasing equity.

n. When you have finished your complete list of Financial Interests and want to continue on to creating your Disclosure documents, click the “Go to My Disclosures” button.
III. Creating a Financial Entity (To be done during the creation of a New Financial Interest)

Because no database can contain all the potential financial entities with which a researcher might need to disclose a relationship, you have the ability enter a new Financial Entity. Please do a thorough search on partial names to verify that the entity you need truly doesn’t exist.

a. When you have completed searching and still cannot find the appropriate entity, click the button reading “I can’t find the Entity I need.”
b. You are taken to a page where you can enter the information you know about the entity, name, abbreviation and type are required, other fields are optional but helpful in avoiding duplicates so please complete them if you can.

c. Click “Save”.

d. You are returned to the Financial Entity Search page with the new entity listed in the grid.

e. Select the Entity by clicking the “Select This” link in the grid.

f. You are returned to the Add New Financial Interest page where you can complete the financial interest entry for the new financial entity.
IV. Creating an Annual Disclosure

Once you have completed your list of Financial Interests, you must create an Annual Disclosure. The Annual Disclosure gathers together all of your Financial Interests with an electronic signature that certifies that all the information is up to date. This disclosure must be re-certified within one year or if you change or add any Financial Interests.

   a. From the Entry page, click on the “My Disclosures” button. If you have done an Annual Disclosure already, you will be taken to the list of your disclosures. If you have never done an electronic disclosure before via this application, you are taken directly to the Annual Disclosure Certification page.

   b. There are no fields to complete on the Annual Disclosure. Verify that the list of Financial Interests is complete and click the “Certify” button at the bottom of the page.

   c. You are returned to your list of Disclosures which now contains your Annual disclosure. You have completed the Annual Disclosure. If you are not currently involved in any research projects or clinical trials, you can log out.
V. Creating an Event-Based Disclosure

Once you have completed your list of Financial Interests and your initial Annual Disclosure, you will need to complete Event-Based Disclosures. An Event-Based Disclosure is specific to a proposal, funded research project or clinical trial. An Event-Based Disclosure allows you to flag Financial Interests that might be perceived as Potential Financial Conflicts of Interest as defined in the UT Policy. An Event-Based Disclosure also contains an electronic signature that certifies that all the information is up to date. This disclosure must be re-certified within one year or if you change or add any Financial Interests which apply to the Disclosure. Note that the instructions on the main entry page now reflect both types of Disclosure.

a. From the Entry page click on the “My Disclosures” button. Because you will have done an Annual Disclosure at this point in time, you will be taken to your list of Completed and Due Disclosures. If you have not yet done an Annual Disclosure, please see Section IV - Creating an Annual Disclosure.

b. Click the RSP Proposal number for the Disclosure you wish to complete next.
You are now presented with your list of currently active Financial Interests. Click the check box next to any Interest that might be perceived as a potential Financial Conflict of Interest with this research. This may include none, some or all of the listed Financial Interests.

<table>
<thead>
<tr>
<th>*Disclosure Type:</th>
<th>Event</th>
</tr>
</thead>
<tbody>
<tr>
<td>*Disclosure Reason:</td>
<td></td>
</tr>
<tr>
<td>Disclosure Refers To:</td>
<td>N-123599-01</td>
</tr>
</tbody>
</table>

Disclosure Identifies the following Financial Interests as Potential FCOI:

<table>
<thead>
<tr>
<th>Applies?</th>
<th>Corporation</th>
<th>Relationship</th>
<th>Amount</th>
<th>Type</th>
<th>Begin</th>
<th>End</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Area Office on Aging of Northwestern Ohio, Inc.</td>
<td>Self</td>
<td>$0-$4,999</td>
<td>Paid Authorship</td>
<td>7/10/2012</td>
<td>7/19/2012</td>
</tr>
<tr>
<td></td>
<td>Toledo Testing Laboratory</td>
<td>Spouse</td>
<td>$0-$4,999</td>
<td>Consulting Fees</td>
<td>5/1/2012</td>
<td>5/31/2012</td>
</tr>
<tr>
<td></td>
<td>Toledo Testing Laboratory</td>
<td>Self</td>
<td>$0-$4,999</td>
<td>Equity</td>
<td>8/6/2012</td>
<td>ongoing</td>
</tr>
</tbody>
</table>

By clicking the button below I attest that I have read the federal and state regulations regarding conflict of interest disclosure, have reviewed my current financial interests, and am certifying that they are current. I understand that if my situation changes I have 30 days in which to update those financial interests and re-certify this disclosure.

I certify that this disclosure is complete.

Return without adding.

d. Click the “Certify” button to complete the Disclosure.

c. You are now returned to your list of Disclosures.
f. Continue adding Disclosures until you have no Proposals, Projects or Clinical Trials listed. If there are proposals or projects on which you are working for which there was no entry, please contact the grants coordinator for that project to be added.
VI. Updating Financial Interests

When the amount or time span of any Financial Interest changes you are required to update that information within 30 days of the change. You are also required to enter any new Financial Interest within 30 days of acquisition. See Section II – Creating a Financial Interest for more detailed instructions.

a. Click the “My Financial Interests” button on the main Entry Page.

b. Click the “View/Edit” link to right of the Financial Interest that has changed.

c. Update the fields that require new information.
d. Click the “Save” button.
e. You are returned to the list of Financial Interests to continue updating or adding new interests.

f. When you have completed your updates to your Financial Interests you must go to your Disclosures to recertify any that have been affected by the changes or additions. Click the button labeled “Go to My Disclosures.”
Re-certifying Disclosures

When you change a Financial Interest, you must re-certify any Disclosures where that Financial Interest was flagged. This will always include the Annual Disclosure, but might also include some or all of the Event Disclosures. Disclosures that need re-certification will be highlighted in red in the My Disclosures list.

a. Click on the “My Disclosures” button on the Entry page.

b. Notice that some of the Disclosures in the list are in red. These are the Disclosures that need re-certification.

c. Click on the “View/Certify” link at the right of the Disclosure you wish to re-certify.

d. Review the list of Financial Interests.
   i. If this Disclosure is an Annual Disclosure and the list of Financial Interests is correct, click the “Certify” button.

ii. If the Disclosure is Event-based, review the list of Financial Interests for correctness and then verify that any new interests are flagged if applicable. Click the “Certify” button when done.
Clicking “Certify” in either case will return you to your list of Disclosures. When there are no more red-highlighted Disclosures, you have finished re-certifying the necessary disclosures and can log out.