

Financial Conflict of Interest Disclosure Tool User Guide

The University of Toledo
Office of Research and Sponsored Programs
COI.Disclosure@utoledo.edu
August 2019

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).

The screenshot shows the login page for the University of Toledo's Conflict of Interest Disclosures tool. The page has a blue header with the title "University of Toledo - Conflict of Interest Disclosures". Below the header, there is a section titled "Login to create new or update existing disclosures." On the left, it says "Enter a valid UTAD username and password." and provides a note: "All people supported on a grant or a Sponsored Program agreement or who have submitted a research proposal are required to file financial disclosures in compliance with University of Toledo policies and federal regulations. All disclosures must be updated at least annually." On the right, there is a "Login" box with fields for "User Name:" and "Password:", and a "Submit" button. Below the login box, there is a message: "If you are unable to login, your account may be expired. Please go to myutaccount.utoledo.edu to reactivate your account or change your password." At the bottom, it says "For further assistance contact the IT Help Desk at 419-530-2400".

Figure 2.1. COI tool *Login* page.

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

The screenshot shows the entry page for the University of Toledo's Conflict of Interest Disclosures tool. The page has a blue header with the title "University of Toledo - Conflict of Interest Disclosures". Below the header, there is a section titled "Review/Update My Financial Interests". It says "For a description of external financial interests that must be disclosed, click [More Information](#)." and "If you DO NOT have any external financial interests to report, skip to the button labeled 'My COI Disclosure.'" There is a button labeled "My COI Disclosure". Below this, it says "All UT personnel must submit a Disclosure, even if you have no external financial interests." There is a link "Get detailed instructions [here](#)." and a message "Need help completing your disclosure of external financial interest? E-mail your questions to our COI help desk at: coi.disclosure@utoledo.edu." There is a link "Click Here to access administrative functions." and a section titled "UT Policies" with links "UT Financial Conflict of Interest Policy for Sponsored Programs" and "CITI Program". There is a section titled "Federal Policies" with a link "42 CFR Part 50 Subpart F: Promoting Objectivity in Research". At the bottom, there is a "Log out" button.

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).

University of Toledo - Conflict of Interest Disclosures

My Financial Interests
 Enter and/or review all your [Financial Interests](#) here.
 -- To add a new financial interest with a new company or organization, click the "Add New" button below the grid.
 -- To view the details of an existing financial interest, click the "View/Edit" link in the grid on the row you wish to view.
 -- To edit an existing financial interest, click the "View/Edit" link in the grid on the row you wish to update.
 -- To add a new financial interest with a company you already have a relationship with, click the "Add Another" link in the grid on the row you wish to copy from.

For a description of financial interests / income and other items which must be disclosed, click [More Information](#)

Entity Name	Relationship	Amount	Type	Begin End	End Date	Archived?	View/Edit this Interest	Add New Interest for this Entity
< Previous Next >								

[Add New Financial Interest/Entity](#)

If you have made any changes to your financial interests, you must recertify your current disclosure, please do so by clicking the button below.

[My COI Disclosure](#)

[Back to Entry Page](#)

[Go to Printable Version \(CURRENT and ACTIVE Interests ONLY\)](#)

Figure 3.1. Initial *My Financial Interests* page.

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).

University of Toledo - Conflict of Interest Disclosures

Add a New Financial Interest
[Show Instructions](#)

*Entity Name: [Find Entity](#)

*Relationship:

*Interest Amount:

*Interest Type:

*Begin Date:

End Date:

☒ Ongoing Interest

Description:

[Save](#) [Cancel](#)

Figure 3.2. Initial *Add a New Financial Interest* page.

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.

University of Toledo - Conflict of Interest Disclosures

Search for a Financial Entity
[Show Instructions](#)

Name:

Type:

[Search for Entity](#)

Search results within Research Database.

Search results within Disclosures

[Cancel and Return](#)
[Entity Not Found](#)

Figure 3.3. Initial *Search for a Financial Entity* page.

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.

University of Toledo - Conflict of Interest Disclosures

Search for a Financial Entity

Show Instructions

Name: test
 Type:
 Search for Entity

Search results within Research Database.

Full Name	Short or Abbr.	Type	URL	Select This Entity
Advanced Virtual Engine Test Cell, Inc.	Advanced Virtual Engine Test Cell, Inc.	Corporate		Select This
American Society for Non-Destructive Testing	American Society for Non-Destructive Testing	Non-Profit	www.asnt.org/publications/mde/index.htm	Select This
American Society for Nondestructive Testing Fellowship	American Society for Nondestructive Testing Fellowship	Non-Profit	www.asnt.org/keydocuments/awards/awards.htm	Select This
Defiance Testing & Engineering Services, Inc.	Defiance Testing & Engineering Services, Inc.	Corporate		Select This
Educational Testing Services	Educational Testing Services	Non-Profit	www.ets.org	Select This
Integrity Testing Laboratory, Inc.	Integrity Testing Laboratory, Inc.	Corporate	www.dfl.space.gc.ca/facility/chapter4/integrit.htm	Select This
Mechanical Testing Services	Mechanical Testing Services	Corporate		Select This
National Medical Technology Testbed	National Medical Technology Testbed	Federal		Select This
Toledo Testing Laboratory	Toledo Testing Laboratory	Corporate	www.toltest.com/	Select This
TolTest, Inc.	TolTest, Inc.	Corporate	www.toltest.com	Select This

< Previous Next >

Search results within Disclosures

Full Name|Short or Abbr.|Type|URL|Stock Exchange|Symbol|Select This Entity

< Previous Next >

Cancel and Return

Entity Not Found

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

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.

- 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).

University of Toledo - Conflict of Interest Disclosures

Add a New Financial Interest

Show Instructions

*Entity Name: Pfizer, Inc.
 Find Entity
 *Relationship:
 *Interest Amount:
 *Interest Type:
 *Begin Date:
 End Date:
☒ Ongoing Interest

Description:

Save

Cancel

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 interest 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.

University of Toledo - Conflict of Interest Disclosures

This is your first Disclosure

By selecting the "I certify" button below, I acknowledge that I (1) have read The University of Toledo policy regarding financial conflict of interest disclosure [here](#) and (2) certify that I have no external financial interests to disclose. I understand that if my external financial interests change, I am required to update those external financial interests and recertify this disclosure within 30 days of the change.

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).

University of Toledo - Conflict of Interest Disclosures

This is your first Disclosure

Current External Financial Interests:

Applies?	Corporation	Relationship	Amount	Type	Begin	End
<input checked="" type="checkbox"/>	Advanced Virtual Engine Test Cell, Inc.	Self	\$5,000-\$9,999	Equity	2/5/2019	ongoing
<input checked="" type="checkbox"/>	Pfizer, Inc.	Self	\$5,000-\$9,999	Consulting Fees	8/1/2019	ongoing

By selecting the "I certify" button below, I acknowledge that I (1) have read The University of Toledo policy regarding financial conflict of interest disclosure [here](#), (2) reviewed my relevant external financial interests, and (3) certify that my external financial interests listed above are correct. I understand that if my external financial interests change, I am required to update those external financial interests and recertify this disclosure within 30 days of the change.

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).

University of Toledo - Conflict of Interest Disclosures

My Financial Interests
 Enter and/or review all your [Financial Interests](#) here.

-- To add a new financial interest with a new company or organization, click the "Add New" button below the grid.
 -- To view the details of an existing financial interest, click the "View/Edit" link in the grid on the row you wish to view.
 -- To edit an existing financial interest, click the "View/Edit" link in the grid on the row you wish to update.
 -- To add a new financial interest with a company you already have a relationship with, click the "Add Another" link in the grid on the row you wish to copy from.

For a description of financial interests / income and other items which must be disclosed, click [More Information](#)

Entity Name	Relationship	Amount	Type	Begin End	End Date	Archived?	View/Edit this Interest	Add New Interest for this Entity
Advanced Virtual Engine Test Cell, Inc.	Self	\$5,000-\$9,999	Equity	8/1/2018	ongoing	False	View/Edit	Add Another
Arts International	Spouse	Cannot be readily determined	Honoraria	8/1/2019	8/2/2019	False	View/Edit	Add Another
Darlington House	Self	Cannot be readily determined	Consulting Fees	10/3/2018	ongoing	False	View/Edit	Add Another
Pfizer, Inc.	Self	\$10,000-\$14,999	Consulting Fees	7/3/2017	ongoing	False	View/Edit	Add Another

< Previous Next >

[Add New Financial Interest/Entity](#)

If you have made any changes to your financial interests, you must recertify your current disclosure, please do so by clicking the button below.

[My COI Disclosure](#)

[Back to Entry Page](#)

[Go to Printable Version \(CURRENT and ACTIVE Interests ONLY\)](#)

Figure 5.1. *My Financial Interests* page with current list of interests.

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

University of Toledo - Conflict of Interest Disclosures

Edit Financial Interest

[Show Instructions](#)

*Corporation: Toledo Testing Laboratory

*Relationship: Self

*Interest Amount: \$10,000-\$14,999

*Interest Type: Equity

*Begin Date: 10/2/2017

End Date: ☒ Ongoing Interest

Description: I now own a larger amount of stock.

Archive this Financial Interest?: ☐

What needs to be disclosed?

Figure 5.2. *Edit Financial Interest* page to update information.

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).

University of Toledo - Conflict of Interest Disclosures

My COI Disclosure:

Your disclosure of external financial interests is due to be re-certified (you updated an external financial interest, your disclosure expires within 30 days, or your disclosure is expired). Select “View/Certify” below to re-certify your COI disclosure:

Updated	Type	RSP #	Status	Funding Agency/Short Title	Action
8/1/2019	Annual				View/Certify

< Previous Next >

Disclosure History
Back to Entry Page
Log out

Figure 6.1. *My COI Disclosure* page with previous disclosure.

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).

University of Toledo - Conflict of Interest Disclosures

Certify My COI Disclosure

Your current disclosure includes no external financial interests.

By selecting the “I certify” button below, I acknowledge that I (1) have read The University of Toledo policy regarding financial conflict of interest disclosure [here](#) and (2) certify that I have no external financial interests to disclose. I understand that if my external financial interests change, I am required to update those external financial interests and recertify this disclosure within 30 days of the change.

Your last Certification was made on: **8/1/2019 11:12:18 AM**

Figure 6.2. *Certify My COI Disclosure* page with no external financial interests.

If this is still the case, select the **[I certify that I have no external financial interests to disclose]** 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.

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).

University of Toledo - Conflict of Interest Disclosures

Certify My COI Disclosure

Your current disclosure includes the external financial interests listed below:

Applies?	Corporation	Relationship	Amount	Type	Begin	End
<input checked="" type="checkbox"/>	Advanced Virtual Engine Test Cell, Inc.	Self	\$5,000-\$9,999	Consulting Fees	8/1/2018	ongoing

By selecting the "I certify" button below, I acknowledge that I (1) have read The University of Toledo policy regarding financial conflict of interest disclosure [here](#), (2) reviewed my relevant external financial interests, and (3) certify that my external financial interests listed above are correct. I understand that if my external financial interests change, I am required to update those external financial interests and recertify this disclosure within 30 days of the change.

Your last Certification was made on: **8/1/2019 11:20:18 AM**

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 consider 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.

University of Toledo - Conflict of Interest Disclosures

Search for a Financial Entity

[Show Instructions](#)

Name:

Type:

Search results within Research Database.

Full Name	Short or Abbr.	Type	URL	Select This Entity
Advanced Virtual Engine Test Cell, Inc.	Advanced Virtual Engine Test Cell, Inc.	Corporate		Select This
American Society for Non-Destructive Testing	American Society for Non-Destructive Testing	Non-Profit	www.asnt.org/publications/rnde/index.htm	Select This
American Society for Nondestructive Testing Fellowship	American Society for Nondestructive Testing Fellowship	Non-Profit	www.asnt.org/keydocuments/awards/awards.htm	Select This
Defiance Testing & Engineering Services, Inc.	Defiance Testing & Engineering Services, Inc.	Corporate		Select This
Educational Testing Services	Educational Testing Services	Non-Profit	www.ets.org	Select This
Integrity Testing Laboratory, Inc.	Integrity Testing Laboratory, Inc.	Corporate	www.dfl.space.gc.ca/facility/chapter4/integrit.htm	Select This
Mechanical Testing Services	Mechanical Testing Services	Corporate		Select This
National Medical Technology Testbed	National Medical Technology Testbed	Federal		Select This
Toledo Testing Laboratory	Toledo Testing Laboratory	Corporate	www.toltest.com/	Select This
TolTest, Inc.	TolTest, Inc.	Corporate	www.toltest.com	Select This

< Previous Next >

Search results within Disclosures

Full Name	Short or Abbr.	Type	URL	Stock Exchange	Symbol	Select This Entity
< Previous Next >						

Figure B.1. *Search for a Financial Entity* page.

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)

Figure B.2. *Add a New Entity* page.

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).

Full Name	Short or Abbr.	Type	URL	Stock Exchange	Symbol	Select This Entity
Jamie's Testing Company	JTC	Corporation	www.jtc.com			Select This

Figure B.3. *Search for a Financial Entity* with a result.

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).