

How to report your annual COI

All faculty and administrative professional employees at CSU are required to complete a Conflict of Interest and Commitment (COI/C) disclosure annually. CSU has implemented a rolling review process. The rolling review process allows reporters to disclose any time during the year and is valid for 364 days.

If you disclose on July 4th 2019, you will have to complete another disclosure before July 4th 2020. If an new SFI or project requires an updated disclosure, the “clock” is reset for another 364 days.

- Cam the Ram submits an approved disclosure on January 14, 2019 but receives a new grant from the Department of Defense on June 3, 2019 and has to update their COI disclosure. After approval of the updated disclosure, Cam will not have to submit again until June 2, 2020.

This process is completed via the Kualu research web application both on and off-campus. Information can be found on the [COI page](#).

Access COI module via the COI page (<https://colostate.kuali.co/coi>) or via the Kualu Research link on the [AAR site](#) and log in via your CSU eID.

1. Once logged in, you will see the option to Create your disclosure (or Edit if you have a disclosure in-progress). *Please read and answer each question completely and carefully.*



2. Please read this page completely and select “Next”.

The screenshot shows the 'CSU Conflict of Interest and Commitment Disclosure Form'. The form is titled 'CSU Conflict of Interest and Commitment Disclosure Form' and is for user 'researcher01'. The disclosure status is 'In Progress'. The form is 0% complete. The form contains several sections: 'Introduction', 'Roles', 'COI/COC Disclosure Quest...', 'Financial Entities', and 'Certification'. The main content area includes a disclaimer, a note about reporting financial or commitment conflicts, and sections for 'Significant Financial Interest' and 'Travel'. There are three callouts: 1. 'Displays your status. Click "next" to move to the next page.' pointing to the 'Next' button. 2. 'For this disclosure you should report all possible financial or commitment conflicts, but only those that meet the criteria would be considered a SFI and possibly require a management plan. See the COI policy page for more information.' pointing to the main text area. 3. 'Link to the COI policy page' pointing to a link at the bottom of the form.

- Answer the screening question about your relationship to research funded by agencies following Public Health Service (PHS) regulations. More information can be found by clicking the link at the bottom of the page.

Reporter: researcher01 | Disclosure Status: In Progress

What are your Roles at CSU PHS Related Proposal or Award

Answer "yes" only if you have research sponsored by a PHS agency

Are you a primary Principal Investigator, Co-Investigator, or Key Person on a funded active award AND/OR on a proposal being submitted to a Public Health Service (PHS) sponsor or by an agency adopting these requirements?

Yes

No

Link to agencies following PHS guidelines

*For purposes of the above question, a list of agencies who have completed PHS training requirements is available at the following link:
[CSU Financial Conflicts of Interest Policy References](#)

25% Complete

Next, Previous, Save

- Selecting "No" will move you to the next section. A "Yes" response will show a page with information about PHS COI/C training.

- PHS training be certified every 4 years.

Update Annual Disclosure

Reporter: researcher01 | Disclosure Status: In Progress

Financial Conflict of Interest Training

The Public Health Service (PHS) has issued revised financial conflict of interest regulations that apply to PHS-funded research. These regulations establish standards that provide a reasonable expectation that design, conduct, and reporting of research will be free from bias resulting from investigator financial conflicts of interest.

This tutorial is intended to meet the PHS requirement in the 2011 revised Federal regulation for Financial Conflict of Interest (FCOI) for investigator training.

Link to training tutorial: <https://rweb.research.colostate.edu/PHSTraining/Slides.aspx>

NOTE: The above link will take you to the external PHS Training Site. If your training record is current (i.e. completed in the last 4 years), then return to this Disclosure. If the training record is not current, then complete the training slides then return to this disclosure.

By clicking Next I certify that I understand and have completed the tutorial as required.

Link to PHS training slides

40% Complete

Next, Previous, Save

- Please carefully review the information regarding International Engagement.

Reporter: Investigator, Jane | Disclosure Status: In Progress

jane.p.investigator@colostate.edu
CO-2010

International Engagement

Do you have any formal interactions (collaborations, participation in a foreign talent recruitment program, research funding, other engagement) with a university or other entity outside the United States?

This includes:

- All foreign research support, whether paid or in-kind, from any source and regardless of whether the support is administered through CSU or elsewhere, or by the investigator him/herself
- Research grants from foreign entities that include measurable effort
- Investigator participation in foreign talent recruitment programs;
- External financial support for laboratory personnel either inside or outside the United States
- Provision of high-value materials or data to a foreign entity that are not freely available
- Paid or unpaid teaching or other summer appointments that are in support of and/or related to research efforts associated with a foreign entity

Yes

No

- Next, you will be directed to the COI/C disclosure screening questions. *Please read each of these screening questions carefully and answer as accurately as possible.* If you have any questions, please see the FAQ's on the [COI page](#) or contact the [COI help desk](#).

CSU Conflict of Interest and Commitment Disclosure Questions

66% Complete

Do you have any compensated financial relationship or fiduciary relationship with a business entity or organization external to CSU?

Yes
 No

Does any immediate family member have a compensated financial relationship or fiduciary relationship with a business entity or organization that does business or significantly interacts with CSU?

Yes
 No

Do you have any other outside relationship or commitment that impacts your institutional teaching, research, and service responsibilities, or from which you could have personal financial gain as a result of your involvement in institutional decision making?

Yes
 No

Are you employed by another State of Colorado institution, organization or agency?

Yes
 No

Are you the author of a textbook or other academic material that is being sold as required course material at CSU?

Yes
 No

Do you have any paid external activities that do not fit into the above options?

Yes
 No

→ Next
← Previous
✓ Save

- If you answered “No” to all six questions, indicating that you have no significant financial conflicts, you will be directed to the Certification page. ***If you answered “yes” to any question, you please proceed to step 9.*** Otherwise, click on the “Submit” button to certify your answers and complete your disclosure.

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Reporter: researcher01 | Disclosure Status: In Progress

Certification

By clicking **Submit**, I acknowledge that it is my responsibility to disclose any new Significant Financial Interests that arise AFTER. I certify that this information is a complete and accurate disclosure at the time of submission.

99% Complete

Click here to certify and submit.

Submit
← Previous
✓ Save

- You should see a confirmation screen, indicating that your disclosure was submitted and approved. You will receive a confirmation e-mail once your disclosure is approved.

← Back Update Annual Disclosure

Reporter	Disclosure Status	Submitted Date	Approved Date	Disposition
researcher01	Up to Date	Jun 5, 2019 1:00 PM	Jun 5, 2019 1:00 PM	No Conflicts

CSU Conflict of Interest and Commitment Disclosure Form

The University seeks to provide an environment that will enhance and further academic and professional careers. The University encourages engagement in professional activities such as: memberships in professional associations; service on review or advisory panels; presentations of lectures, papers, concerts, and exhibits to external audiences; textbook authorship; various editorial assignments; and appropriate consulting activities.

Faculty members and administrative professionals owe their primary professional obligation to the University, and their primary commitment of time and intellectual energies should be to teaching and advising, research and other creative activities, and service and/or outreach of the institution. A full-time appointment conveys an obligation to maintain a meaningful presence on behalf of the University in the performance of responsibilities. For those with on-campus appointments, this obligation includes being accessible to students, staff, and colleagues during the appointment period. A conflict of commitment arises when a faculty member or administrative professional undertakes external commitments which substantially burden or interfere with the employee's primary obligations and commitments to the University.

Disposition status

Print
Management Plan

- If you answered “Yes” to any of the 6 screening questions, you will be asked to enter information about your significant financial entity(ies) and your relationship to the entity.

Click on “Add Info” to add an entity or select the pencil icon to add/edit an entity. Please enter all of the information for your financial entity.

Click the pencil again to add any additional financial entities. If your entity is no longer active, you should de-activate it by clicking the pencil and toggling. A blue button is active, grey is not. **Do not delete a non-active entity.**

CONFLICT OF INTEREST kuali researcher01 (impersonated by Callahan,Zachary)

Update Annual Disclosure

Reporter: researcher01 | Disclosure Status: In Progress

Outside Entity Information
Based on your previous responses, you are required to complete the 'Outside Entity Information' section of this Disclosure Form. Follow the instructions provided below to add or update entities in your listing:

- NEW ENTITIES: Click "+ Add Info" below to add new entities.
- ADDITIONAL ENTITIES: Click "+ Add Line" to insert additional entities.
- EXISTING ENTITIES: Select the Edit Pencil next to an existing entity to edit as needed.

Click here to add or edit

SFI entity status

ACTIVE	ENTITY NAME	TYPE OF ENTITY	BUSINESS OF ENTITY	ENTITY ADDRESS	ENTITY SPONSORSHIP
No	NCURA	Non Profit	professional development/engagement	Washington DC	Yes

Columns + Add Line

75% Complete

Next Previous Save

- Be sure to complete all of the pop-up fields, including the “**Outside Entity Relationship**” section -- which describes whether you, your spouse, or your dependent is the person involved with this entity. Select “ + Add Line” or the pencil icon to add this information. If you have multiple financial entities, click the pencil again to describe the relationships.

Outside Entity Information

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- ADDITIONAL ENTITIES: Click "+ Add Line" to insert additional entities.
- EXISTING ENTITIES: Select the Edit Pencil next to an existing entity to edit as needed.

Click here or select the pencil icon to add/edit

Columns + Add Line

ACTIVE	ENTITY NAME	TYPE OF ENTITY	BUSINESS OF ENTITY	ENTITY ADDRESS	ENTITY SPONSORSHIP
Yes	Thieme Medical Publishers	For Profit (publicly traded)	Publication of medical journals	Stuttgard, Germany	No
No	NCURA	Non Profit	professional development/engagement	Washington DC	Yes

11. To improve reporting, if you are a Primary Investigator, Co-PI, or key person on some federally funded projects, you will be asked to disclose on the specific relationships between the project and your financial entity. You can choose to view in “Project View” or “Financial Entity View”.

Define the relationship between your project

PROJECT NAME	REPORTER RELATIONSHIPS	COMMENTS
NIH Test Award for reporting	<input checked="" type="radio"/> No Conflict <input type="radio"/> Potential Conflict	This consulting company doesn't relate to my research.
Additional NIH Test Award for researcher COI reporting	<input checked="" type="radio"/> No Conflict <input type="radio"/> Potential Conflict	Adding comment discussing this Entity as it relates to my Research Award.

12. Review the certification screen and select “submit” to certify your disclosure.

13. If answered “Yes” to any of the 6 screening questions, your disclosure will be routed to the COI office or your supervisor. You will receive a confirmation e-mail once your disclosure is approved

14. If you have any problems, please contact the [COI Help desk](#).