Why do you need to disclose:

Rutgers University Investigator Conflict of Interest Policy 90.2.5 requires that PIs and all personnel working on research projects, regardless of source of funding or lack thereof, disclose financial information that may reasonably be perceived to influence their work. This policy is intended to promote objectivity in research with the reasonable expectation that the design, conduct, and reporting of the research will be free from bias resulting from Investigator financial conflicts of interest.

Please note that having something to disclosure does not imply any wrong-doing or inappropriate activities. The emphasis is on disclosure of financial interests to develop a management plan to mitigate any potential conflict of interest for those disclosures which have a confluence of interests with the research or training project.

Who needs to disclose:

All University faculty, non-faculty employees, students (graduate and undergraduate, part-time or full-time) and other individuals who, in the course of their association with the University:

(1) apply for or receive funds for any research or training purpose, by grant or sub-grant, or by contract or subcontract, or by cooperative agreement, or are engaged in research (i.e.: are responsible for the design, conduct, or reporting of research. For example: an undergraduate student entering data must disclose because they are engaged in the conduct of the study); or

(2) conduct unsponsored/unfunded research.

What do you need to disclose:

All investigators [defined broadly as anyone who is involved in the design, conduct, administration, collaboration, analysis, and/or reporting of the research] should disclose any “financial interest” or other personal involvement of the investigator, or his or her immediate family, that are related to the individual’s Institutional responsibilities.

Financial interest means anything of monetary value, whether or not the value is readily ascertainable. Interests include, but are not limited to: income; honoraria or other payment for services; equity such as stock, stock options or other ownership rights (except interests of any amount in publicly traded, diversified mutual funds, pension funds, or other institutional investment funds over which the faculty member does not exercise control); patents and copyrights; contracts, licensing and other agreements; royalties (including those royalties distributed by the University); employment; reimbursed travel or sponsored travel; and services, relationships or positions, even if uncompensated.
Excluded from the disclosure requirement are:

income from seminars, lectures, or teaching engagements, reimbursed travel or sponsored travel, and service on advisory or review panels sponsored by a federal, state, or local government agency, an Institution of higher education as defined at 20 U.S.C. 1001(a), an academic teaching hospital, a medical center, or a research institute that is affiliated with an Institution of higher education.

For more information on the type of interests to disclose, please review the Rutgers University Policy 90.2.5 “Investigator Conflict of Interest”.

When do you need to disclose:

A financial Conflict of Interest Disclosure must be submitted to Rutgers University:

1. **At Proposal Submission**: An Individual Certification must be submitted before a grant application is submitted to Rutgers ORSP;
2. **At Award Set-up**: A Research Initiated Certification must be created in the eCOI system once an award is received
3. within thirty days of discovering or acquiring a new significant financial interest (SFI) (e.g., through purchase, marriage, or inheritance); and
4. at least annually
HOW TO LOG-IN TO eCOI SYSTEM

1. Go to https://eCOI.Rutgers.edu
2. Click Log In to enter the site.
3. Enter your Rutgers Net-ID Username and Password.

YOUR PERSONAL WORKSPACE

- Your Personal Workspace, otherwise known as ‘My Inbox’, will consist of items requiring action, i.e., “Draft” certification.
- From the “COI Submissions” tab (top left of screen) click “My Inbox” at the top right of your screen.

THE DISCLOSURE CERTIFICATION WORKSPACE

- Whenever you open an existing certification from your Inbox, you will be taken to the project’s workspace.
- The project workspace is the area where all activities associated with the disclosure will be performed.

CREATING A NEW DISCLOSURE CERTIFICATION

1. INDIVIDUAL (SELF) CERTIFICATIONS: Use this option to self-disclose only; this serves as your annual disclosure and is not associated with a research project. To begin, click on the “Create My Certification” option on the left. The information entered here will be retained for all future disclosure certifications.
   - Complete all questions on the disclosure details screen.
   - If you make a disclosure of outside interest, be sure to click “Finish” at the bottom of the disclosure window.
   - Click “Add Disclosure” for each additional organization/company you are reporting.

2. RESEARCH BASED CERTIFICATIONS (required for new awards):
   - Use this option for research based disclosure certifications. (i.e. grants, contracts, IRB paper submissions, etc.)
   - NOTE: Do not use this option for electronic IRB submissions. The eIRB system contains an activity button “Create Financial Disclosure in eCOI” which will generate “Draft” research certifications and link to the eCOI system for completion.
   - All previously collected data from the individual (self) certifications will display on the research based certification.
   - This option will allow you or anyone with a Rutgers NetID to create a “Draft” research initiated certifications for the entire project team. Important: If you are performing this activity and are a research team member, you must add yourself to the form to receive a draft research certification.

HOW TO ACCESS AND SUBMIT A CERTIFICATION

Click “My Inbox” (upper right corner) to see the list of active certifications to be completed.

Click the link under the column “Name”. Next, click “Start/ Edit”, begin completing your disclosure certification.

Upon completion of entering all disclosures and you are ready to submit your disclosure certification, you will navigate to the “Assurance and Certification” page; click the “Submission Confirmation” checkbox (serves as your signature) and then click the “Finish” button. (Omitting the two actions will cause the certification to remain in “Draft”).

PRINTER VERSION OF DISCLOSURE CERTIFICATION

On the certification cover page, click the “Printer Version” button in your workspace.

COMPLETINGrequested CHANGES

Access your certification by:
⇒ Log-in at https://eCOI.rutgers.edu and click “My Inbox”, OR
⇒ Click on the link within the e-mail you receive from the eCOI system which will direct you to the disclosure certification workspace.

1. Review the “History” tab for comments from the Requestor
   ⇒ To add requested information to a specific section of the certification, click the “Edit” button and navigate through the form by clicking “Continue”, make changes, click “Save” and “Exit” to return to cover page. Next, click “Submit Changes”, add an comment, click “OK”.
   ⇒ To return only a comment to the Requestor, click “Submit Changes”, enter comment, click “OK”.
   ⇒ The certification will be returned to the Requestor.
Adding New or Updating Disclosures

You need to disclose any financial relationship with an external company or organization where you or an immediate family member received remuneration or if you hold equity in said company. On your certification disclosure record, navigate to the “Disclosure Details” smart form page. On this page, you will be required to provide information on each company/external organization with which you have a financial relationship.

1. If the relationship has not previously been disclosed, click on the "Add Disclosure" button.

2. If the relationship has been previously disclosed, click on the "Edit" link next to the disclosure to update.

3. If the relationship is no longer active (e.g., a consulting agreement that is no longer active), click the "Remove" link to the right of the disclosure.

   The disclosure will be removed after the certification is in a final review status, i.e., "No Review Required, Review Complete, Management Plan Required"

Uploading Documents

How to upload documents to your disclosure certification

Click the Add button and a new window will appear.

Enter a Title for the document you are uploading OR Click Browse...and select the file you want to attach. Click Open. Then Click OK.

Editing and Deleting Documents

How to edit documents that have previously been uploaded

- An certification cannot be edited while it is under review.
- 1. Open the document on your computer or network drive.
- 2. Make the necessary changes.
- 3. Save the document.
- 4. Back in the eCOI application, select the checkbox beside the name of the currently uploaded document.
- 5. Use the [Edit] button to upload the revised copy.

How to delete documents that have previously been uploaded

1. Select the checkbox in front of the name of the document to be deleted.
2. Click the Delete button.