

FCOI Initial Disclosure

Investigators, key persons and others as required, must submit a **Financial Conflict of Interest (FCOI)** disclosure of **Significant Financial Interests (SFIs)** for themselves and their Family that appear to be **Reasonably Related** to their **Institutional Responsibilities** in MyCOI-OPA+:

- At proposal stage (during proposal certification), if there is a potential conflict of interest indicated in answering the COI screening questions
- At award stage (when an award is received), if no disclosure was submitted at proposal stage or is required by sponsor
- On a rolling basis:
 - Within 90 days of acquiring or changing a **Significant Financial Interest (SFI)**
 - PHS and some other federally sponsored investigators must disclose within 30 days, and include **Sponsored Travel** in their disclosure
 - If 12 months have passed since their last FCOI disclosure

If you have been notified to create your **FCOI Initial Disclosure** in MyCOI-OPA+ or **Revise your FCOI Disclosure**, you must complete and certify your disclosure in MyCOI-OPA+. **How it works:**

1. **Engagements** – create and update your Engagements on an ongoing basis. Keeping Engagements current (including inactivating entities you no longer have a relationship with) helps keep the disclosure process streamlined and accurate. See [Create Engagements \[PDF\]](#) to learn more.
2. **Create FCOI Disclosure** from Home if this your first FCOI disclosure in MyCOI-OPA+.
 - Or -
 - Revise FCOI Disclosure** if you would like to update your last submitted FCOI Disclosure.
3. **Complete the Four Step Disclosure process: Screening Questions, Engagements, Relationships, and Certification**

Create / Revise FCOI Disclosure

1. Go to mycoi-opa.mit.edu and you will be authenticated via **MIT Touchstone**.
2. MyCOI-OPA+ will open to **Home** Dashboard. Click one of the following options displayed as applicable:
 - Click **Create FCOI Initial Disclosure** to create your Initial OPA Disclosure if this is your first FCOI disclosure in MyCOI-OPA+.

Important Reminder:

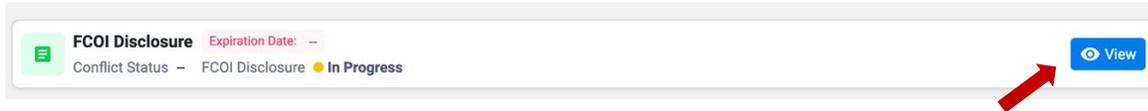
 Please only disclose engagements that could be or appear to be reasonably related to your MIT Institutional Responsibilities. This helps ensure accurate and meaningful reporting. If you're unsure whether an engagement qualifies, consider whether it overlaps with your MIT duties, research, or decision-making roles. ×

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Please disclose any personal, financial, or other interests that may influence your judgment and decision-making at work. Click the 'Create FCOI Initial Disclosure' button to begin your FCOI Initial Disclosure

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Create FCOI Initial Disclosure

- Click the **Revise** button to update an **FCOI Disclosure** previously submitted and approved in MyCOI-OPA+. You may leave the MyCOI-OPA+ FCOI Disclosure while In Progress and return to complete. Click the **View** button to open the FCOI Disclosure for revision.



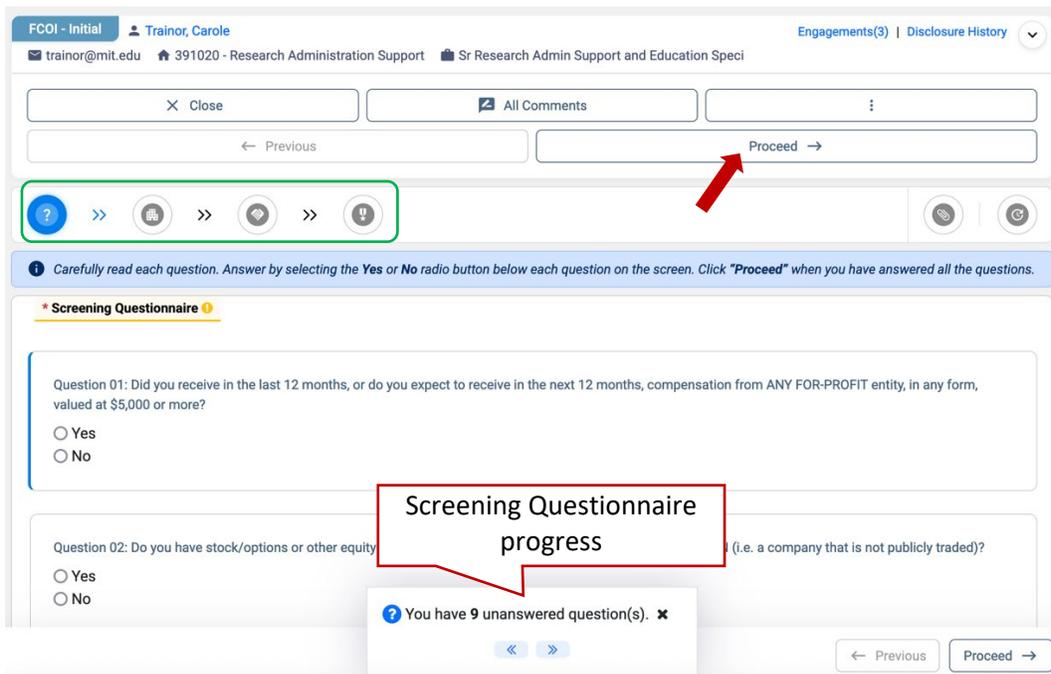
- After creating or modifying an **Engagement in MyCOI-OPA+**, you may receive an **Action List** prompt to create or revise an FCOI disclosure.



Screening Questionnaire

The FCOI Disclosure will open to the first step: **Screening Questionnaire**.

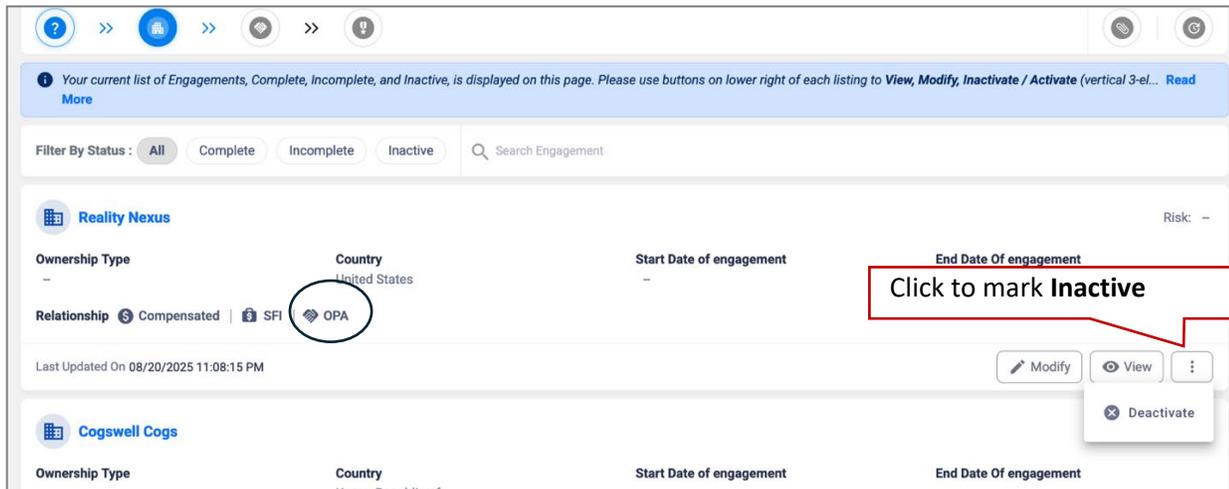
3. You will need to answer these questions as part of your Initial FCOI disclosure, or when revising your existing FCOI disclosure. The bottom of the screen will show your progress.
4. When complete click the **Proceed** button.



Engagements (Significant Financial Interests)

The FCOI Disclosure will progress to the second step: **Engagements**. Your current list of Engagements is displayed with buttons to filter by status, including **All**, **Complete**, **Incomplete**, **Active**, **Inactive**. There is also a button to **+ Add Engagement** (see [Create Engagement \[PDF\]](#) to learn more). Note, once created, an **Engagement may be modified or marked as “Inactive”** but **can never be deleted** as they remain part of your historical record.

5. Click **View** to review details of each Engagement. Click **Modify** if you need to update the Engagement Details, including use MIT resources, students, or staff/subordinates. You may also update Financial details, such as the income, equity, or other interest from the entity in the matrix.

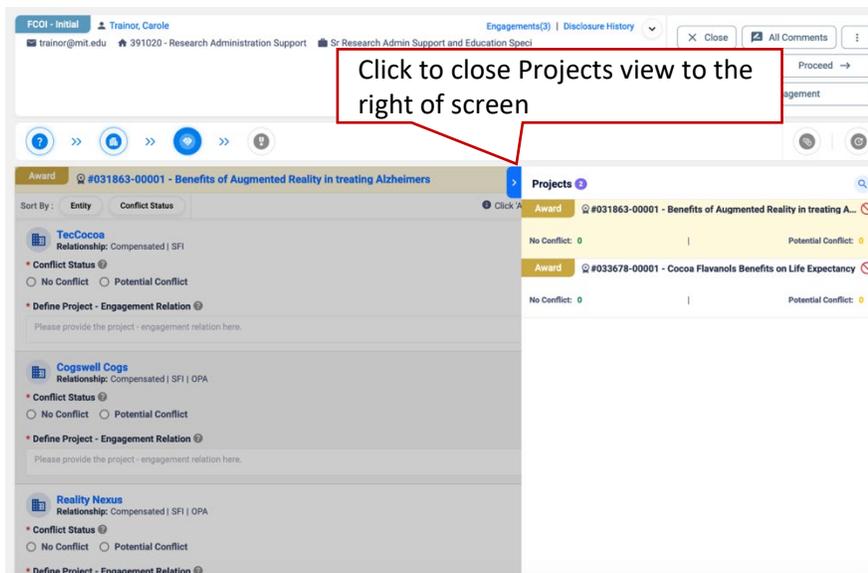


6. Click the vertical 3-ellipsis button to mark an Engagement as **Inactive**, if needed. The Engagement will stay as part of your historical record and may be **Activated** using the same button in the future.
7. When complete, click the **Proceed** button.

Relationship of SFI to Project

The FCOI Disclosure will open to the third step: **Relationships**. Describe the relationship between each project (awards and pending proposals) and each Engagement (SFI).

8. The **Projects** window summarizing your Awards and Proposals requiring disclosure will appear on the right. Click the blue arrow to collapse or expand.



9. Describe the **Relationship** between each Engagement (Significant Financial Interest) and each Project (Proposal or Award). Select a radio button for **Conflict Status**:
- **No Conflict**
 - **Potential Conflict.**
10. In the **Define Project – Engagement Relationship** text box, you must describe the relationship between the project in focus and this entity; how your relationship with each Entity and how it relates to or does not relate to your sponsored projects. If there is no relationship between the works you are doing with this entity and the current project, enter an explanation of how the works differ. Please note: "none", "no relationship", "n/a" are not acceptable descriptions, please review examples provided.

Examples:

- There is no relationship between the work performed for Related Entity and this project, as this project involves the development of a rapid diagnostic for biosensing of diseases, which is not in the area of Entity's interest.
- Related Entity's business has nothing to do with the project regarding device for electrical & chemical modulation of pathological neural activity.
- This project involves organizing a computational conference on sustainability. The Related Entity activity involves providing strategic advice on applying autonomous systems to mechatronics.
- My work for Related Entity involves giving advice about yeast genetic engineering. This research project is aimed at understanding basic cell biological processes such as protein folding and intracellular trafficking

The screenshot displays the 'FCOI - Initial' interface for user 'Trainor, Carole'. The top navigation bar includes 'Engagements(3)' and 'Disclosure History'. Below the header, there are navigation buttons: 'Close', 'All Comments', 'Previous', 'Proceed', and 'Add Engagement'. The main content area shows a list of engagements under the heading 'Award #031863-00001 - Benefits of Augmented Reality in treating Alzheimers'. The 'Sort By' options are 'Entity' and 'Conflict Status'. An 'Apply to All' button is present for updating conflict status and descriptions. Two engagement entries are visible:

- Cogswell Cogs**: Relationship: Compensated | SFI | OPA. Risk: -. Conflict Status: No Conflict, Potential Conflict. Define Project - Engagement Relation: Cogswell Cogs manufactures components for Augmented Reality technology but is more focused on industrial application where my research is in the use of AR for improving cognition in the elderly.
- Reality Nexus**: Relationship: Compensated | SFI | OPA. Risk: -. Conflict Status: No Conflict, Potential Conflict. Define Project - Engagement Relation: I am the co-founder of Reality Nexus which manufactures head gear for measuring the effect of AR on the brain. I use the head gear in my research.

11. When you have completed the **Relationship** screen, click the **Proceed** button.

Certification

The FCOI Disclosure will open to the fourth step: **Certification**.

- **Certification** displays at the bottom of the screen. To complete the FCOI disclosure process, you must certify the information you disclosed is true and complete to the best of your knowledge.
- If so, select the **certification checkbox** and then click the **Submit** button.

The screenshot shows the 'FCOI - Initial' page for user 'Trainer, Carole'. The page includes navigation buttons like 'Close', 'All Comments', 'Previous', and 'Proceed'. A prominent blue 'Submit' button with a checkmark is highlighted by a red arrow. Below the navigation is a blue informational banner: 'To complete the FCOI disclosure process, you must certify the information you disclosed is true and complete to the best of your knowledge. Review the certification below, select the checkbox and clic... Read More'. The main content area contains a certification statement: 'In submitting this FCOI disclosure, I certify that I agree to abide by the Institute's FCOI policy and guidelines. I further certify that the information provided in this disclosure, including responses to screening questions, list of my pertinent Engagements and Significant Financial Interests and possible relationship to my sponsored activity, is an accurate and current statement of my reportable outside interests and activities.' A red arrow points to a checked checkbox next to this statement.

- A confirmation window will pop-up. Click **Submit** to confirm

The screenshot shows a modal dialog box titled 'Submit FCOI Initial Disclosure'. The text inside asks, 'Are you sure you want to submit the FCOI Initial disclosure?'. At the bottom of the dialog are two buttons: 'Cancel' and 'Submit'. A red arrow points to the 'Submit' button.

View Submitted FCOI Disclosure

13. From the MyCOI-OPA+ **Home**, click the **View** button on the **FCOI Disclosure** panel.

The screenshot shows the 'View Submitted FCOI Disclosure' page. It features a header with user information and navigation options. The main content is divided into sections: 'Details' (Administrator, Admin Group), 'Dates' (Create: 08/21/2025, Submission: 08/21/2025, Expiration: 08/20/2026), and 'Status' (Conflict: Potential Conflict, FCOI Disclosure: Submitted). Below these is a 'Disclosures' section with tabs for 'Disclosure', 'Attachments', and 'History'. The 'Disclosure' tab is active, showing a 'Screening Questionnaire' with a green checkmark. The questionnaire includes questions like 'Question 01: Did you receive in the last 12 months, or do you expect to receive in the next 12 months, at \$5,000 or more?' and 'Question 02: Do you have stock/options or other equity interest of ANY value in a PRIVATE COMPANY?'. A 'Screenshot' button is visible at the bottom right.