CoeusLite My COI: Create Proposal Disclosure Significant Financial Interests

Proposal Disclosure is a four-step process including Step 1: Screening Questions, Step 2: Significant Financial Interests, Step 3: Relationships, Step 4: Certify.

Significant Financial Interest includes the financial interest of the Investigator and also the financial interest of his or her spouse/Domestic Partner and dependent children when it could reasonably appear to be related* to the Investigators Institutional Responsibilities.

*Investigators may make a reasonable, good-faith determination as to whether their research or other Institutional Responsibilities could affect the value of a financial interest, or have a financial impact on the Entity in which they hold a financial interest. For example, do not disclose a Spouse’s salary with a company that’s business focus is not related to Research or other Institutional Responsibilities.

Visit the MIT COI website http://coi.mit.edu/research/ for more detailed information.

Step Two: Significant Financial Interests

Instructions for Significant Financial Interests will display. For a definition of what constitutes a Significant Financial Interest and what is considered exempt, click the ? icon.

1. Click the Continue button.

The Significant Financial Interests for <Lastname, Firstname> screen will display.

1. All Active and Inactive Significant Financial Interests will be listed. Travel Only Entities (added during Travel Disclosure) appear in the lower portion of the screen. You will be required to answer questions and describe the relationship between all Active SFIs and your Project in completing your Proposal Disclosure.

2. Review the SFIs listed. Click Edit to view details for the SFI and modify as needed. You may make an existing SFI Active or Inactive by clicking the link to the right of the listing. Use the Add Significant Financial Interest button to add an SFI.

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OSP Coeus Support & Data | Aug-2013
If you Quit before completing the SFA Entity, you must return to CoeusLite My COI and click the SFI Entity button under the Revise heading.

Make Inactive

Once created, a Significant Financial Interest will remain as part of your Master Disclosure permanently. SFIs may be marked “inactive” but can never be deleted because they must remain part of the historical record. If a SFI listed no longer meets the definition of a Significant Financial Interest, or if you no longer hold that financial interest:

1. Click the Make Inactive status link.
2. Enter detailed explanation for Inactive status
3. Click Save.

The Entity will now be listed as Inactive (it can be changed back to Active by clicking Make Active).

No Significant Financial Interests listed

If you answered Yes to one or more of the Screening Questions in Proposal Certification but do not have any existing SFIs, you must do one of the following:

- Return to Step One: Screening Questions and click the Proposal Questions link to return to Proposal Certification to make corrections if an error was made in entering your responses.
- Click the Add Significant Financial Interest button to create a Significant Financial Interest (see next section for details).
Edit or Add Significant Financial Interest

**Note:** NIH Investigators and Key Persons must disclose within 30 days of discovering or acquiring (e.g. through purchase, marriage, or inheritance) a new significant financial interest.

To create or edit a Significant Financial Interest (SFI)

1. Click the **Add Significant Financial Interest** button to create a Significant Financial Interest (SFI). To edit an existing SFI click the **Edit** link to the right of the Entity listing.

2. The Add Significant Financial Interest screen is divided into two sections:

   **Significant Financial Interests Details** – describe the business focus for the entity, your role with the entity, involvement of students or staff, and use of MIT resources

   **Relationship Details** – disclose financial details for the SFI

1. In the **Significant Financial Interest Details** section, enter details for the Significant Financial Interest in required fields marked with a red * asterisk:

   - **Entity Name** – enter the full name of the domestic or foreign, public or private, organization (excluding a Federal agency) from which you (your spouse or dependent children) receive income or has an ownership or equity interest.

   - **Publicly/Privately held** – select from the menu to indicate if the entity is **publicly held** (shares/stock are publicly traded) or **Privately held** (no shares are publicly traded).

   - **Type** – Select from the menu (i.e., For-profit Organization, Federal Government, Small business).

   - **Are you/Family member a Founder/Co-Founder of this entity?** – Select the **Yes** or **No** radio button.

   - **In a few sentences briefly describe the entity’s area of business focus and specifically your work or Role with the entity** – enter a detailed description of the business and your involvement.

   - **Explain any involvement of students under your direction at MIT with this entity:** – enter a detailed description.

   - **Explain any involvement of staff or subordinates under your direction at MIT with this entity:** – enter a detailed description.

   - **Explain any use of MIT resources and/or facilities relating to your work with this entity:** – enter a detailed description.
2. In the **Relationship Details** section, use the pull-down menus to disclose financial information related to the entity for your **Self**, **Spouse/Domestic Partner**, and **Dependents** (children who are unemancipated and under 18 years of age or who receive more than one-half support from you). Add **Comments** at the end of each line as needed (click on [...] to expand the textbox).

3. If there is no financial information to enter for you, your spouse/domestic partner, or dependents, leave the field at the default “None”.

4. Click the **Save & Create Another SFI** button if you have another Significant Financial Interest to disclose.

5. Click **Save & Continue** if the information is complete and you have no additional SFIs to enter.

When you have finished reviewing, editing, and adding Significant Financial Interests as needed:

1. Click the **Continue with Disclosure** button to proceed to **Step 3: Relationships**. See the **CoeusLite :My COI Create SFI Entity Relationships Quick Reference Card** for more information.
Getting help

MIT Financial Conflicts Of Interest in Research
   MIT COI website – http://coi.mit.edu
   MIT COI Policy – http://coi.mit.edu/policy

Conflict of Interest Officer
   COI-help@mit.edu
   Questions about the Conflict of Interest Policy

Coeus Support Team
   kc-help@mit.edu
   CoeusLite My COI system issues and authorizations
   Include your Name, Contact information, and a brief description of the problem you are experiencing.