Welcome to Kuali COI Financial Disclosures

As an investigator on a proposal submitted or award made in Kuali, you must disclose certain information with respect to conflicts of interest on “real” or “potential” Significant Financial Interests to UMBC on an annual basis.

UMBC implemented the Kuali Research Conflict of Interest (COI) module to document the disclosure processes governed by the UMBC Interim Policy on Individual Financial Conflicts of Interest in PHS Funded Research and UMBC Policy on Individual Conflicts of Interest in Research & Product Development.

Below are step by step instructions to help you complete a “Negative” or a “Positive” disclosure. This user guide provides a brief description of each of these steps followed by screenshots from the COI module.

The “percentage or completion” scale will let you know the status of your work.

Questions? Please contact the ORPC staff at compliance@umbc.edu.
Identifying COI in Kuali

Any proposal submitted or award provided to a Public Health Services (PHS) entity [e.g., NIH] or a NonPHS [e.g., NSF] or one that involves the reporting of potential financial conflicts of interest (FCOI), will require the use the Kuali COI module to report a disclosure.

Proposal Development and Awards require that “Key Persons” be identified. Once all “Key Persons” are entered, each person will see a certification “status” update box.

Annual Disclosure status under Key personnel must state “Up to Date” before OSP can move forward with final submission or award approval. If the Annual Disclosure says “Update Needed” or “Expired”, the identified Key Personnel must go into the COI module to complete their COI.
Connecting the Proposal Development module with COI

Investigators who are identified in a proposal as a “Key Person” are then alerted by Kuali, via email, to submit an annual disclosure in the COI module (see next slide for sample email).

While the COI module does not automatically sync with proposals entered into Proposal Development (Prop Dev), investigators will need to enter specific information about a proposal if there is an identified “Positive” disclosure. More on this later in the guide.
The **Annual Disclosure** status must state “Up to Date” before OSP approval. If this status says “**Update Needed**” or “**Expired**”, you must use the COI module to submit a disclosure.
Kuali email sample

Subject line: **Action Required: Create COI disclosure due to a new project**

Hello **UMBC USER**,

You must complete a Conflict of Interest (COI) disclosure immediately because you have been added as **KUALI ROLE** on **Proposal ### PROPOSAL TITLE, PI NAME**. Login to Kuali Research and create a COI disclosure at: [https://umbc.kuali.co/coi](https://umbc.kuali.co/coi). If you have any questions, please contact ORPC at **compliance@umbc.edu**. Thank you for assisting UMBC in ensuring compliance with our policies and financial Conflict of Interest regulations.
Connecting the Award module with COI

Following the same process in proposal submissions, investigators who are identified in an award as a “Key Person” are then alerted by Kuali, via email, to submit an annual disclosure in the COI module (see next slide for sample email).

While the COI module does not automatically sync with awards, investigators will need to enter specific information about a proposal if there is an identified “Positive” disclosure. More on this later in the guide.
The Annual Disclosure status must state “Up to Date” before OSP approval. If this status says “Update Needed” or “Expired”, you must use the COI module to submit a disclosure.
Kuali email sample

Subject line: **Action Required:** Create COI disclosure due to a new project for a current award

Hello **UMBC USER,**

You must complete a Conflict of Interest (COI) disclosure immediately because you have been added as **KUALI ROLE** on **Award ##** **TITLE.** Login to Kuali Research and create a COI disclosure at: [https://umbc.kuali.co/coi](https://umbc.kuali.co/coi). If you have any questions, please contact ORPC at [compliance@umbc.edu](mailto:compliance@umbc.edu). Thank you for assisting UMBC in ensuring compliance with our policies and financial Conflict of Interest regulations.
My Disclosures

After clicking on [https://umbc.kuali.co/coi](https://umbc.kuali.co/coi), you’ll see “My Disclosures” and “My Travel Log”. This will show where to add new (or update) disclosures. Selecting the “Add Annual Disclosure” or “Update Annual Disclosure” button will lead you to a series of screening questions that assist the ORPC in determining if any additional steps are required for processing your disclosure. COI training is captured here as well; PIs are reminded that COI training is required for PHS proposal submissions.

The ORPC will work with investigators and their respective Chairs/supervisors via the Kuali module to review and communicate any next steps related to your disclosure.
Sample “My Disclosures” Screen

Depending on email instructions you’ll receive, this button will say “Add Annual Disclosure” or “Update Annual Disclosure.”

Investigators who have previously taken the CITI COI training (for PHS proposals) will see training completion dates here. If not (and the proposal is for a PHS agency), you must take training: https://research.umbc.edu/conflict-of-interest-training-2/

Once a disclosure is entered into the COI module, this list will show the type, when last reviewed by ORPC with one of these statuses – Up to Date, Approved, Submitted for Approval, Update Needed or Returned.
My Travel Log

For PHS proposals only: Before moving forward creating or updating a COI disclosure, click on the “My Travel Log” portal to provide details about non-grant, non-UMBC funded travel form the past 12 months that relates to your “university responsibilities” that may be seen as a real or perceived conflict of interest. The ORPC will review the travel logs and COI disclosure information.
IMPORTANT: PHS regulations state you must disclose ALL external entity sponsored reimbursed or paid travel that appears related to university responsibilities. Travel that was paid for via UMBC department funds, a grant or contract to UMBC, a U.S. federal, state or government agency does not require disclosure. Travel paid for by foreign institutions, such as universities and governments, must be disclosed.
COI Screening Questions

These screening questions will determine your individual role, as an investigator, in research projects as they relate to UMBC’s COI policies.

You’ll be asked if you’re an “investigator”, if being one has any impact on your “university responsibilities” and if you have any “significant financial interests” that may be seen as a real or perceived conflict of interest.

Read each question and answer “yes” or “no” to all of the five (5) questions. You’ll then be asked to review a summary of your answers before moving on. Again, you’ll either have a “Negative Disclosure” or a “Positive Disclosure”.
Negative Disclosures

(FCOI amounts that fall within the $$ amount, per policy)
A “Negative Disclosure” means you do not have any significant financial interest to report (disclosures over a total of $5,000 in the last 12 months) and/or you do not have a financial relationship or received travel funding with an entity (e.g. a company) that’s considered external to your UMBC responsibilities.

If you are identified in a proposal as a “Key Person” and receive an email from Kuali, answer “yes” to screening question # 1. And, if none of the remaining screening questions apply, answer “no”.
COI Screening Questions

1. For ALL proposals
   I am an investigator or have been identified as an co-investigator or key person who is responsible, fully or partially, for the design, conduct, or reporting of this research.

   Yes

2. During the past twelve months, did you and/or your family members receive aggregated compensation - monetary or otherwise exceeding $5,000 in value from any single external (non-UMBC) entity operating in areas relating to your UMBC responsibilities?
   Please include any compensation paid to you and your family such as, but not limited to:
   - Consulting Fees
   - Honoraria
   - Speaking Fees
   - Sponsored or Reimbursed Travel
   - Income Related to any Interests or Rights in Intellectual Property
   - Stipends
   - Dividends
   - Stock Options
   - Gifts

   You do not need to include income from seminars, lectures, teaching engagements, advisory committees, review panels or travel that is reimbursed or sponsored by a US federal, state, or local government agency, a US Institution of higher education, a US academic teaching hospital, a US medical center, or a research institution that is affiliated with a US institution of higher education.

   You must disclose if you received compensation from foreign (non-US based) investments or income from a foreign institution of higher education or government of another country.

   No
COI Screening Questions

3. Did you and/or your family members, hold at some point during the last twelve months, any ownership interest in a publicly external entity (foreign or domestic) operating in areas relating to your UMBC responsibilities and which, when aggregated together for all of you, represents an equity interest that exceeds $5,000 in value or 5% ownership of a public entity?

   No

4. Did you and/or your family members, hold at some point during the past twelve months, an ownership interest in a non-publicly traded external entity (foreign or domestic) operating in areas relating to your UMBC responsibilities (i.e. a faculty start-up company or family business related to your research)?

   No

5. Did you or your spouse, domestic partner, or dependent children receive travel reimbursement from the past 12 months that appears to be related or could reasonably be perceived by non-experts related to your institutional responsibilities? Open My Travel Log portal as a new tab or page to enter travel details.

   IMPORTANT! Travel is defined as a scientific meeting, research collaboration, professional service, professional development, or data collection reimbursed or sponsored by a third-party or a foreign institution of higher education or government. Travel does not have to be disclosed if reimbursed by UMBC department funds, a grant or contract to UMBC, a U.S. federal, state or government agency, other U.S. institution of higher education; an academic teaching hospital; a medical center; or a research institute that is affiliated with a U.S. institution of higher education.

   Note: you must disclose any travel reimbursement from a foreign institution of higher education or government.

   No
Screening Questions Summary

1/4 of the way there!

Click “Next Step”. Answers of “No” to all questions 2 through 5 documents there are no COIs to deal with. Continue to the next entry page. You’ll be directed to verify there are no financial entities. If none, click on the box “I have no entities to disclose”. Then click “Next Step”.

Negative Disclosures
Verification of Entity Information

Please enter information about all the financial entities you, your spouse, domestic partner, or dependent children have associated with your institutional responsibilities. Include relationships in which any of the above have a financial interest and/or a financial relationship with UMBC involving your research. Then indicate the nature of each of these relationships with each financial entity.

You may be asked to elaborate on one or many of your responses to these questions by uploading research project abstracts or proposal documents.

☐ I have no entities to disclose

You currently have no active financial entities.
50% finished!!

Click on “Next Step” to certify and acknowledge you will follow all UMBC COI policies and procedures.
Negative Disclosures

Final COI Certification

CERTIFICATION

Add any information or attachments for your annual disclosure. Drafts and final versions of Conflict of Interest Management Plans (if required) may be attached here. Then please certify and submit your disclosure for review.

The investigator agrees to abide by the UMBC Interim Policy on Individual Financial Conflicts of Interest in NIH Research as well as the UMBC Policy on Individual Financial Conflicts of Interest and certifies that the information provided is true to the best of his/her knowledge. The investigator understands and agrees that if there is a change (such as an acquisition of a significant financial interest) to this information, that he/she must submit a new disclosure within 30 days of that change.

I acknowledge that it is my responsibility to disclose any new SIGNIFICANT FINANCIAL INTERESTS obtained during the term of this disclosure. I certify that this is a complete disclosure of all my financial interests related to the projects therein.
**Final COI Certification**

*Finished !!*

By ticking the box at the bottom of the screen, you acknowledge and certify that you are aware and follow UMBC’s COI policies and procedures. *That’s all!*

After this initial “negative” disclosure, Kuali will not ask you again about this disclosure even if new proposals or awards are added to Kuali where you’re identified as a “key person”. See sample email on the next slide.
Kuali email sample

Subject line: Annual COI Disclosure Needs Update due to new project to disclose

Dear **UMBC USER**, Your annual disclosure needs to be updated because you have been identified in the role **KUALI ROLE** on **Proposal ### PROPOSAL TITLE, PI NAME**. This role must be disclosed. To update your annual disclosure, please login to Kuali Research COI and access your annual disclosure at [https://umbc.kuali.co/coi](https://umbc.kuali.co/coi). If you have any questions, please contact ORPC at [compliance@umbc.edu](mailto:compliance@umbc.edu). Thank you for assisting UMBC in ensuring compliance with our policies and financial Conflict of Interest regulations.
Your disclosure is now complete and has been sent to the ORPC staff for review; it’s been marked “Submitted for Approval”. You can review the disclosure information by clicking the “Annual Disclosure” link.

The ORPC will review your submission and get back to you within 5 days if there are any questions or concerns. The system will track questions from ORPC and responses from you to finalize the disclosure. The system verifies if COI training is completed (for PHS proposals only). If not, ORPC will request the PI complete before final disclosure approval.

Once Kuali approves, disclosures are good for 364 days. The software will send you a reminder at least 30 days in advance. Remember, you are not required by the software to update the disclosure when new projects or awards are added. But, you will if you add a financial entity (which makes this a “positive” disclosure. This is done using the “update” button. Remember, you must notify the ORPC of any changes within 30 days of a change to a “significant financial interest”. The proposal/award module will show COI certification is complete.
### My Disclosures

<table>
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<td>Annual Disclosure</td>
<td>Mar 2, 2017</td>
<td>Archived</td>
</tr>
</tbody>
</table>

You have no COI Training courses on file.
Your disclosure expires in: 355 Days
Positive Disclosures

(FCOI amounts that fall above the $$ amount, per policy)
Positive Disclosures

A “Positive Disclosure” means you do have any significant financial interest to report (disclosures over a total of $5,000 in the last 12 months) and/or you do have a financial relationship or received travel funding with an entity (e.g. a company) that’s considered external to your UMBC responsibilities.

If you are identified in a proposal as a “Key Person” and receive an email from Kuali, answer “yes” to screening question # 1 and “yes” to any of the remaining screening questions.
COI Screening Questions

1. For ALL proposals

I am an investigator or have been identified as an co-investigator or key person who is responsible, fully or partially, for the design, conduct, or reporting of this research.

   Yes

2. During the past twelve months, did you and/or your family members receive aggregated compensation - monetary or otherwise exceeding $5,000 in value from any single external (non-UMBC) entity operating in areas relating to your UMBC responsibilities?

   Please include any compensation paid to you and your family such as, but not limited to:
   - Consulting Fees
   - Honoraria
   - Speaking Fees
   - Sponsored or Reimbursed Travel
   - Income Related to any Interests or Rights in Intellectual Property
   - Stipends
   - Dividends
   - Stock Options
   - Gifts

   You do not need to include income from seminars, lectures, teaching engagements, advisory committees, review panels or travel that is reimbursed or sponsored by a US federal, state, or local government agency, a US Institution of higher education, a US academic teaching hospital, a US medical center, or a research institution that is affiliated with a US institution of higher education.

   You must disclose if you received compensation from foreign (non-US based) investments or income from a foreign institution of higher education or government of another country.

   Yes
COI Screening Questions

3. Did you and/or your family members, hold at some point during the last twelve months, any ownership interest in a publicly external entity (foreign or domestic) operating in areas relating to your UMBC responsibilities and which, when aggregated together for all of you, represents an equity interest that exceeds $5,000 in value or 5% ownership of a public entity?

Yes

4. Did you and/or your family members, hold at some point during the past twelve months, an ownership interest in a non-publicly traded external entity (foreign or domestic) operating in areas relating to your UMBC responsibilities (i.e. a faculty start-up company or family business related to your research)?

No

5. Did you or your spouse, domestic partner, or dependent children receive travel reimbursement from the past 12 months that appears to be related or could reasonably be perceived by non-experts related to your institutional responsibilities? Open MyTravel Log portal as a new tab or page to enter travel details.

**IMPORTANT:** Travel is defined as a scientific meeting, research collaboration, professional service, professional development, or data collection reimbursed or sponsored by a third-party or a foreign institution of higher education or government. Travel does not have to be disclosed if reimbursed by UMBC department funds, a grant or contract to UMBC, a U.S. federal, state or government agency, other U.S. institution of higher education, an academic teaching hospital, a medical center, or a research institute that is affiliated with a U.S. Institution of higher education.

Note: you must disclose any travel reimbursement from a foreign institution of higher education or government.

No
Screening Questions Summary

1/4 of the way there!

Click “Next Step”. Answers of “Yes” to one or more of questions 2 through 5 documents there are COIs to deal with. Continue to the next entry page. You’ll be directed to describe financial entities.
Verification of Entity Information

Please enter information about all the financial entities you, your spouse, domestic partner, or dependent children have associated with your institutional responsibilities. Include relationships in which any of the above have a financial interest and / or a financial relationship with UMBC involving your research. Then indicate the nature of each of these relationships with each financial entity.

You may be asked to elaborate on one or many of your responses to these questions by uploading research project abstracts or proposal documents.

Whispers Inc
Verification of Entity Information

50% finished!!

Completing information on the prior screens now generates the “entity” in which you have a “significant financial interests” which creates a COI. Click on “Add Entity”. For this example, we’ve created one for Whispers, Inc. The next screens will provide information required to create a Conflict of Interest Management Plan to manage that COI.
Entity Information

Follow these steps to finalize the link of the Whispers, Inc. COI to proposal to the National Center for Environmental Health. Click to enter (or edit) information about the “entity” in which there is a potential conflict of interest. In this example, the PI has ownership in a company called “Whispers, Inc”. Enter the specific information on this screen. Specific questions ask about your duties/roles, percentage/shares owned, the relationship you have with the entity and if the entity is sponsoring your research.

Include the proposal number, award number and title.
# Entity Information

## Entity

**Entity Name:**

Whispers Inc.

_What is the address and other financial contact information for this entity?_

1234 Anyroad
Baltimore MD 21208

_What type of entity best fits your relationship(s):_

- [x] County Government
- [ ] Small Business
- [ ] Large Business
- [ ] State Government
- [ ] Foreign Institute and/or Government

_What is or will be the specific title or duties/responsibilities in this entity? Briefly describe._

I will be the President and CEO.

_Please describe the percentage of the entity owned, the purchase price or fair market value at the time you acquired the interest._

I own 50%.

_If this entity sponsors your research, please provide a brief abstract of the work and include the entity's interest in this activity._

The National Center for Environmental Health funds this research. My company will do fabulous work.

_Does this research activity involve the participation of UMBC students (graduate or undergraduate)? If so, will their faculty advisors have any involvement in the activity or with the entity?_

- [ ] Yes
- [x] No
- [ ] NA

_Does this entity sponsor any of your research?_

- [x] Yes

_Make email parts you can't hear._

## Relationships

**Entity:**

National Center for Environmental Health - Proposal # 84

_Please list all of your research or product development projects that have taken place over the past year that involve the entity, including corporate funded research and collaborations._

- [ ] Earned income
- [ ] NA

_Are you currently involved in any cybersecurity related projects that are externally funded?_

- [ ] Yes
- [x] No
- [ ] NA

## Attachments

_Drag and drop or click to upload your attachments.

Acceptable Formats: .pdf, .png, .doc, .jpeg._

**Name:**

Cancel

Save
### Relationship Information

<table>
<thead>
<tr>
<th>Person</th>
<th>Relationship</th>
<th>Type</th>
<th>Amount</th>
<th>Comments</th>
</tr>
</thead>
<tbody>
<tr>
<td>Self</td>
<td>Ownership</td>
<td>Stock</td>
<td>$5,001 - $10,000 (PHS)</td>
<td>stocks of whispers</td>
</tr>
</tbody>
</table>

### Attachments

**Add Relationship**

- **Relationship:** Ownership
- **Person:** Self
- **Type:** Stock Options
- **Amount:** $5,001 - $10,000 (PHS)
- **Comments:**
Almost done!!

The COI disclosure related to a funded project disclosed in the Kuali Proposal Development will need certification from you and your supervisor that no conflict exists or if there is a conflict, it can be managed with a Conflict of Interest Management Plan. Click the “Update” button.

The declaration page will show all proposals you have identified that may have a COI.
Project Declarations

Select the appropriate project declaration for each of your financial entity-project relationships. A “Significant Financial Interest” as defined by PHS and by UMBC’s Policy on Individual Conflicts of Interest in Research & Product Development, UMBC III-1.11.01, applies when the declarations apply to you, your spouse, domestic partner, or your dependent children. You can use the “Set All” function to apply a declaration to all relationships at once.

Testing COI - version 2

- Action Required -

- Project Type: Proposal
- Project Number: 94
- Project Role: Principal Investigator, PI/Contact
- Sponsor: National Center for Environmental Health

Next Step
PI and Supervisor Review

Here, you and your supervisor will certify that your involvement with Whispers, Inc. shows no conflict exists or if there is a conflict, it can be managed with a Conflict of Interest Management Plan. If additional information is needed or changes are required, you’ll receive an email from Kuali – see the sample of the next page.
Kuali email sample

Subject line: **Annual COI Disclosure was Returned to Reporter**

Dear **UMBC USER**, Your annual disclosure submitted on **DATE OF SUBMISSION** was returned on **DATE OF RETURN** for the following reason Dear PI. Please review the COI Management Plan developed for you for **NAME OF FINANCIAL ENTITY FROM COI DISCLOSURE** and add the relevant information to the financial entities section. If you have any questions, please contact us at compliance@umbc.edu. Please login to Kuali Research COI and access your disclosure at [https://umbc.kuali.co/coi](https://umbc.kuali.co/coi) to update and submit your disclosure. If you have any questions, please contact ORPC at compliance@umbc.edu. Thank you for assisting UMBC in ensuring compliance with our policies and financial Conflict of Interest regulations.
PI and Supervisor Review

You may select one specific project to certify the existence of a conflict. Or, if you, as a PI, have submitted multiple proposals, click the “SFI View” button to perform certification on all current proposals or awards and add specific comments about the COI on those proposals or awards.

The ORPC staff will work with you and your supervisor to draft a COI Management Plan. Click “Done”; once saved, click “Next Step”
Here, you and your supervisor will check if:

**A potential conflict of interest exists** OR

**No conflict of interest exists**
Final COI Certification

*Finished !!*

By ticking the box at the bottom of the screen, you acknowledge and certify that you are aware and follow UMBC’s COI policies and procedures. *That’s all!*

There is an upload box to add any supportive documents (e.g. disclosure documents, project descriptions, etc.) related to your COI disclosure.
Final COI Certification

CERTIFICATION

Add any information or attachments for your annual disclosure. Drafts and final versions of Conflict of Interest Management Plans (if required) may be attached here. Then please certify and submit your disclosure for review.

The investigator agrees to abide by the UMBC Interim Policy on Individual Financial Conflicts of Interest in NIH Research as well as the UMBC Policy on Individual Financial Conflicts of Interest and certifies that the information provided is true to the best of his/her knowledge. The investigator understands and agrees that if there is a change (such as an acquisition of a significant financial interest) to this information, then he/she must submit a new disclosure within 30 days of that change.

I acknowledge that it is my responsibility to disclose any new SIGNIFICANT FINANCIAL INTERESTS obtained during the term of this disclosure. I certify that this is a complete disclosure of all my financial interests related to the projects therein.
Your disclosure is now complete and has been sent to the ORPC staff for review; it’s been marked “Submitted for Approval”. You can review the disclosure information by clicking the “Annual Disclosure” link.

The ORPC will review your submission and get back to you within 5 days if there are any questions or concerns. The system will track questions from ORPC and responses from you to finalize the disclosure. The system verifies if COI training is completed (for PHS proposals only). If not, ORPC will request the PI complete before final disclosure approval.

Once Kuali approves, disclosures are good for 364 days – see sample email on the next slide. The software will send you a reminder at least 30 days in advance. Remember, you are not required by the software to update the disclosure when new projects or awards are added. But, you will if you add a financial entity (which makes this a “positive” disclosure. This is done using the “update” button. Remember, you must notify the ORPC of any changes within 30 days of a change to a “significant financial interest”. The proposal/award module will show COI certification is complete.
Kuali email sample
Subject line: Annual COI Disclosure is Approved

Dear **UMBC USER**, Your annual disclosure submitted on **DATE** was approved on **DATE**. To view your disclosure, login to your COI Dashboard at [https://umbc.kuali.co/coi](https://umbc.kuali.co/coi) and go to Disclosure Archives. If you have any questions, please contact ORPC at [compliance@umbc.edu](mailto:compliance@umbc.edu). Thank you for assisting UMBC in ensuring compliance with our policies and financial Conflict of Interest regulations.
Disclosure Submission

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You have no COI Training courses on file. Your disclosure expires in 355 Days.
We appreciate your time in assisting UMBC in ensuring compliance with our Financial Conflict of Interest regulations. If you have any questions, comments or suggestions, please let us know by going to the ORPC feedback page or contacting us at compliance@umbc.edu.