Creating an Annual COI Disclosure
Kuali Quick Card

After clicking on https://umbc.kuali.co/coi, you’ll see “My Disclosures”. 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.

Depending on email instructions (see below) 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.
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. 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.

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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.
Investigators designated as “Key Persons” on a proposal submitted or award made in Kuali must disclose certain information with respect to conflicts of interest on “real” or “potential” Significant Financial Interests to UMBC on an annual basis. Once all “Key Persons” are entered, each person will see a certification “status” update box. The 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.

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Kuali COI uses screening questions to 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”.

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".
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”.

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

Click “Next Step” to certify and acknowledge you will follow all UMBC COI policies and procedures.
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 the below sample email.

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. 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.

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Kuali COI uses screening questions to 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”.

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, if none of the remaining screening questions apply, answer “no”.

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
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.

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.

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.
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.
COI Screening Questions - Negative Disclosure
Kuali Quick Card

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 below sample.

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. 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.

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”

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.
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.

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