



## From the University at Buffalo Institutional Review Board

### Click Conflict of Interest

The following memo outlines information for Submitting an Annual Financial Disclosure vs. Research Certification

#### What's the difference between Annual Disclosure and Research Certification?

- An annual financial disclosure is submitted once a year through the COI module of CLICK
- The annual disclosure should be updated whenever you have a change to the one on file
- The research certification is done for EACH study submitted to the IRB to attest to your level of conflict of interest with the specific sponsor of the research (see below)
- In either case, failure to submit your annual disclosure or complete the research certification for the individual study will result in a delay in IRB approval

#### 1. Annual Financial Disclosure

- An annual financial disclosure is to be submitted no later than November 1<sup>st</sup> of every year.
- Even if you have no outside organizations or companies with which you or an immediate family member have a financial relationship you still need to complete the annual disclosure.
- If there are any changes during the year, you should disclose any Financial Interests of you and your immediate family member within 30 days of acquiring or discovering the interest, by updating the financial disclosure in CLICK COI.
- You may be asked to provide additional information as your Disclosure Certification is reviewed.
- If a management plan is required, your agreement to the plan must be documented prior to any funding related to your SFI(s) or SO(s) being released. If a Management Plan is in place, you are responsible for all its terms, conditions and actions.

#### 2. Submitting an Annual Disclosure in Click

- 45 days prior to your annual disclosure being due, you will receive your first notification from the system. That notification and every subsequent one sent will provide you with a link that will prompt you to login and will take you to your annual disclosure to select and submit.

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- If you delete or do not receive the email notification to submit your annual disclosure, please go to the following website: <http://www.buffalo.edu/research/research-services/compliance/coi.html> and log into the Click Portal using your UBIT credentials.
- Once logged in, if you click the COI tab at the top, your annual disclosure will be located here. See screen shot below.

University at Buffalo The State University of New York

Patricia Rybij | My Inbox | Logoff

Agreements **COI** Grants IACUC IRB Safety

Page for PATRICIA RYBIJ Components

**Links by Solution**

- Agreements
- COI**
- Grants
- IACUC
- IRB
- Safety

Compliance Tasks SPO Tasks

**My Inbox**

Filter by ID Go Clear Advanced

page 1 25 / page

Campus: 030 University at Buffalo University at Buffalo The State University of New York Any technical difficulties please email support@research.buffalo.edu. Compliance\_Release68ALL (Mon Mar 20 18:53:45 EDT 2017)

University at Buffalo The State University of New York

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Agreements **COI** Grants IACUC IRB Safety

COI

**COI**

- COI Meetings
- COI Reports

Edit My Certification

Create Team Certifications

Create Res. Certifications

All Certifications Administrative Review Under Management Plan

Filter by Last Name rybij Go Clear Advanced

ID	Name	First Name	Last Name	Type	Status
DC00000262	Annual Disclosure Certification for Patricia Rybij 2016	Patricia	Rybij	Annual Certification	Draft

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- Select your Annual Disclosure Certification and select “edit” to begin.
- Answer all questions on the Smart Form pages and continue.
- When done, select “finish” and make sure you select “Submit Disclosure” on the left side to complete the process. See below.

You Are Here: Annual Disclosure Certificatio... Edit: Disclosure Certification - DC00000055

<< Back Save | Exit | Hide/Show Errors | Print... | Jump To: Assurance and Certification - **Finish**

### Annual Certification for Rebecca Simms (pi)(030) : Assurance and Certification

- I hereby acknowledge that I have read and understand the Financial Conflicts of Interest Policy.
- I affirm that the information provided is to the best of my knowledge true and complete and does not misstate any facts.
- I will provide any additional information as requested by my campus.
- I agree to cooperate in the development of any needed *Management Plan* as required per the Federal Regulations to manage, reduce, or eliminate existing conflicts of interest or obligations related to my research. I agree to comply with the terms and conditions contained in any *Management Plan*.

Disclosures Under Review:		
Organization	Disclosure Type(s)	Total Value
General Atomics Electronics Systems Inc	Equity (shares / options / private ownership) in external company	\$25,000.00

  

Reviewed Disclosures:		
Organization	Disclosure Type(s)	Total Value
There are no items to display		

**\*\*\*BEFORE YOU FINISH\*\*\***

To save your disclosure certification for completion at a later time: DO NOT check the confirmation box and click "Finish"

To finalize and submit your disclosure certification for review: DO check the confirmation box and click "Finish"

My disclosures are up-to-date and accurate and I confirm that I understand and agree with the above statements.

<< Back Save | Exit | Hide/Show Errors | Print... | Jump To: Assurance and Certification -

Home Courses Agreements **COI** Facilities Grants IACUC IRB Safety Rebecca Simms (pi)(030) | My Inbox | Logoff

COI Submissions > Annual Disclosure Certification for Rebecca Simms (pi)(030) 2017 Components

**Draft** Type: Annual Certification | ID# DC00000055 | Discloser: **Rebecca Simms (pi)(030)** | Phone: 716-645-5000

**My Current Actions**

- Edit
- Printer Version
- Submit Disclosures**
- Log Comment

**Disclosures** History

**Notes to Discloser**

This institution is committed to ensuring its faculty an open and productive environment in which to conduct teaching, patient care, and research. The institution's concern for conflict of interest reflects the ever-increasing complexity of our society, our various relations with each other and with outside institutions, along with the heightened national and governmental sensitivity to such matters.

Principal investigators should ensure that any staff, students, or other employees who participate in the design, conduct, or reporting of research, complete a COI disclosure form. Additionally, anyone engaged in any sponsored program, whether or not involving research, must complete an annual disclosure form. Disclosures must also be updated during the year whenever interests change.

To prepare for completing this form, you may want to collect the following documents:

- any consulting agreements you have signed this year
- receipts from travel paid by outside companies
- any stock option agreements
- your stock portfolio summary
- your IRS 1040 and/or 1099 forms.

To get started: Click on the "Edit" button to the left, under "My Current Actions".

My Disclosures			
Organization	Publicly Traded?	Relationships Disclosure Types	Significant? Total

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## 2. Research Certifications

- A research certification is created within Click when 4 different actions happen:
  1. A new award comes in.
  2. A new funded study is submitted to the IRB.
  3. A funded study is submitted for continuing review.
  4. A new study team member is being added to a funded study.
- A research certification is a study/award specific way to either update your annual disclosure or certify that no changes need to be made to your annual.
- Upon award, a research certification is created for the PI, Co-I's and key personnel.
- For IRB protocols, a research certification is created for the PI and all study team members.
- You will receive a system generated email with a link to the research certification. Should you not receive the email or it gets deleted, follow the link above and hit the COI tab at the top, it will be in your inbox.
- The research certification will include the study or award number as well as the project name, your role and project type.

The screenshot displays a web interface for a research certification. At the top, there is a navigation bar with tabs for Home, Courses, Agreements, COI (selected), Facilities, Grants, IACUC, IRB, and Safety. The user's name, Rebecca Simms (pi)(030), and options for My Inbox and Logoff are visible in the top right. Below the navigation bar, the page title is "COI Submissions > Research Initiated Certification for Rebecca Simms (pi)(030): MODCR00000123". A "Components" button is located in the top right corner of the content area.

The main content area is divided into two columns. The left column contains a sidebar with the following items: "Draft" (highlighted in yellow), "My Current Actions" (with buttons for "Edit" and "Printer Version"), "Submit Disclosures" (with a right-pointing arrow), "Log Comment" (with a comment icon), "My Disclosures", "Meetings", "Reports", "COI Discloser Quick Reference", "COI Advanced Reports Reference", and "COI QuickStart Guide".

The right column contains the main form content. At the top, it shows "Type: Research Initiated Update | ID# DC00000042 | Discloser: Rebecca Simms (pi)(030) | Phone: 716-645-5000". Below this are tabs for "Disclosures" (selected) and "History". A section titled "Research Certification Instructions" contains the text: "You must recertify that all of your financial disclosures are up-to-date in the system because of your involvement in the following research project(s):". Below this, a yellow box highlights the following information: "Research Project ID: MODCR00000123", "Research Project Name: Test", "Research Project Role: Principal Investigator", and "Research Project Type: IRB".

Below the instructions, there is a note: "Remember that you must disclose any financial interests that could be reasonably construed as related to the design, conduct, recruitment, or enrollment of subjects in the above research." A section titled "Notes to Discloser" contains a paragraph: "This institution is committed to ensuring its faculty an open and productive environment in which to conduct teaching, patient care, and research. The institution's concern with conflict of interest reflects the ever-increasing complexity of our society, our various relations with each other and with outside institutions, along with the heightened national and governmental sensitivity to such matters." Below this, another paragraph states: "Principal investigators should ensure that any staff, students, or other employees who participate in the design, conduct, or reporting of research, complete a COI disclosure form. Additionally, anyone engaged in any sponsored program, whether or not involving research, must complete an annual disclosure form. Disclosures must also be updated during the year whenever interests change." The bottom of the page is partially obscured by a jagged, torn-paper edge effect.

- Select the "edit" button and continue through the Smart Form pages to review the information that was populated from your annual. Should you need to make any

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changes, you can do so now. If your disclosure is accurate and up to date finalize and submit your disclosure.

You Are Here: Research Initiated Certificati... Edit: Disclosure Certification - DC00000042

<< Back Save | Exit | Hide/Show Errors | Print... | Jump To: Assurance and Certification Finish

### Research Initiated Update for Rebecca Simms (pi)(030) : Assurance and Certification

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