

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 <u>EACH</u> 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

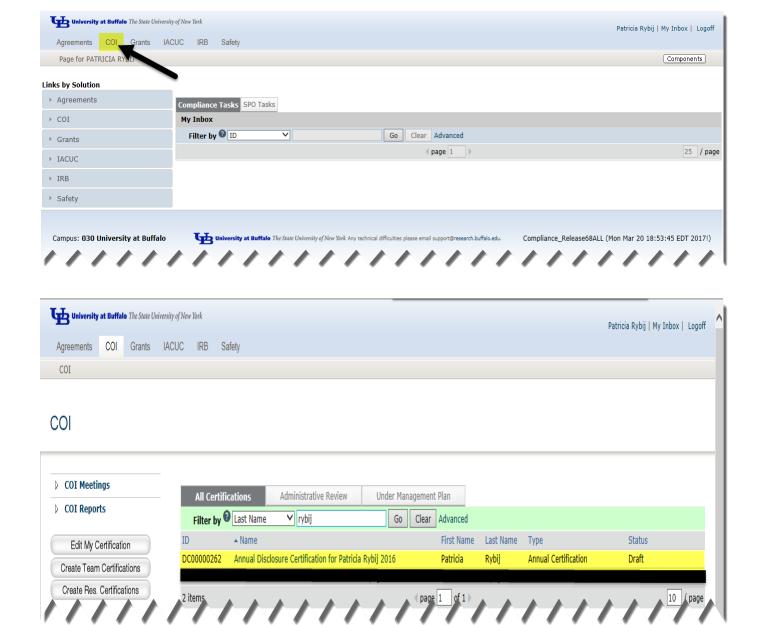
1. Annual Financial Disclosure

- An annual financial disclosure is to be submitted no later than November 1st of <u>every</u> 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.

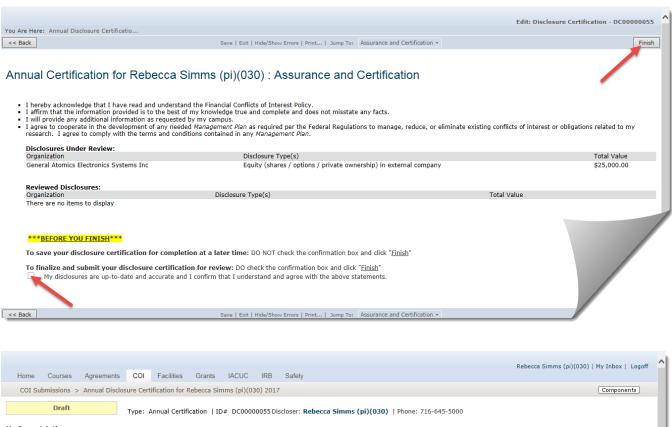
2. Submitting an Annual Disclosure in Click

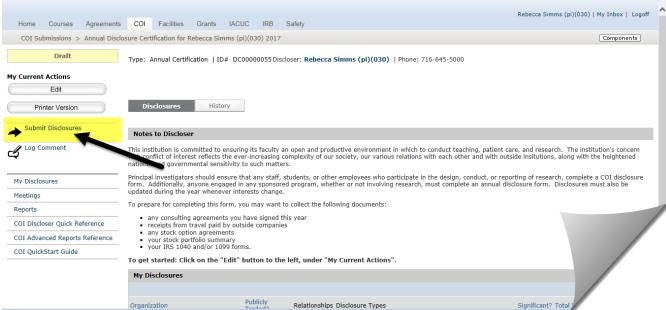
➤ 45 days prior to your annual disclosure being due, you will receive your first notification from the system. That notification and every subsequent one sent will provide you with a link that will prompt you to login and will take you to your annual disclosure to select and submit.

- 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.



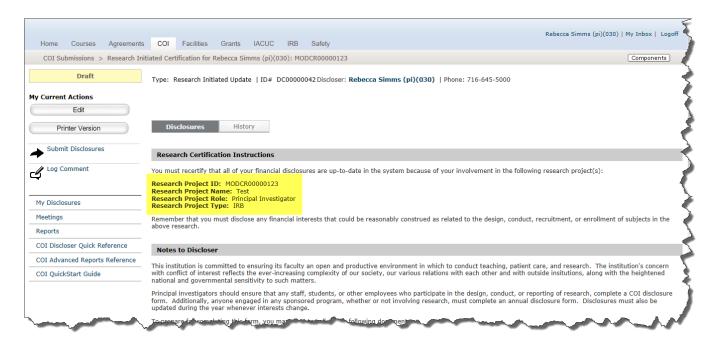
- Select your Annual Disclosure Certification and select "edit" to begin.
- Answer all questions on the Smart Form pages and continue.
- When done, select "finish" and make sure you select "Submit Disclosure" on the left side to complete the process. See below.





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.



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

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

