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 1st 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 will provide you with a link that will prompt you to login and will take you to your annual disclosure to select and submit.
From the University at Buffalo Institutional Review Board

- 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 screenshot below.
From the University at Buffalo Institutional Review Board

- 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.

**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.

**Submit Disclosure**

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 about any actual or potential 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 nature of 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
- research grants from 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”. 
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
From the University at Buffalo Institutional Review Board changes, you can do so now. If your disclosure is accurate and up to date finalize and submit your disclosure.

Research Initiated Update 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:

<table>
<thead>
<tr>
<th>Organization</th>
<th>Disclosure Type(s)</th>
<th>Total Value</th>
</tr>
</thead>
<tbody>
<tr>
<td>General Atomic Electronics Systems Inc</td>
<td>Equity (shares / options / private ownership) in external company</td>
<td>$25,000.00</td>
</tr>
</tbody>
</table>

Reviewed Disclosures:

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"

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