
What do I need to disclose in my Annual Conflict of Interest Disclosure Form?

New conflict of interest regulations require some changes to the information that you must disclose in your annual COI disclosure form. Unless otherwise specified, the changes outlined below will apply to all Columbia investigators, regardless of funding. However, certain requirements will apply only to those who receive NIH or other PHS funding, or who plan to apply for such funding. This reference guide can help as you prepare to file your COI disclosure in Rascal.

Institutional Responsibilities

One important change is a new requirement that you disclose financial interests that reasonably appear to be related to your *Institutional Responsibilities*, not just those financial interests that are related to your research. The phrase *institutional responsibilities* is understood to mean all of the activities that you are required to perform in fulfilling your obligations to Columbia University, including your sponsored activities (such as sponsored research or service projects), teaching, University administrative duties, clinical practice, and other University activities.

To understand what is meant by “related to your institutional responsibilities,” you should think about your outside activities that are associated with your area of professional expertise, or that are related to your role at the University. Ask yourself, “Am I being asked to participate in this outside activity because I am a professional in my field at Columbia University?” If the answer is “Yes,” then it may reasonably appear that the requested activity is “related to your institutional responsibilities.” By this measure, any consultation in your area of professional expertise should be disclosed. However, if, for example, you are an orthopedist with a family business that imports rugs, that would not need to be disclosed. Keep in mind that “relatedness” is not always a bright-line determination. You should use your judgment when deciding what needs to be disclosed; but when in doubt, err on the side of transparency.

Financial Interests

As before, you must disclose *Financial Interests* of any amount that are held or received by you or your *Family* (see below). However, the new requirements mandate broader disclosures than before. For example, *Financial Interests* now include remuneration from, and other relationships with, *not-for-profit as well as for-profit entities*. Financial Interests fall into several categories:

- ❑ Compensation/Remuneration – You must disclose all non-Columbia salary and payments for services (such as consulting fees, honoraria, etc.) received by you or your family from outside entities, including not-for-profit as well as for-profit entities, that reasonably appear to be related to your institutional responsibilities.
 - You should *not* include:
 - salary or other remuneration from the University (other than royalty payments);
 - income from seminars, lectures or teaching sponsored by a Federal, state or local government agency, a 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;
 - income from service on advisory committees or review panels for a Federal, state or local government agency, a 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.

- ❑ **Equity interests** – You must disclose any stock, stock option, or other ownership interest in any outside entities, held by you or your family, that reasonably appear to be related to your institutional responsibilities.
 - You should not include:
 - equity held in diversified financial holdings that you or your family do not directly control, influence or manage, such as mutual funds and retirement accounts.
- ❑ **Royalty Payments** – You must disclose any payments to you or your family from intellectual property rights that reasonably appear to be related to your institutional responsibilities, such as royalties, license fees, or similar payments. Be sure to include payments received either directly from an outside entity, which includes not-for-profit as well as for-profit entities, or through the University (such as through a University license agreement).
 - PHS researchers must also include royalties or other income received from an independent publishing company arising out of authoring, editing or reviewing publications (print or electronic).
- ❑ **Special Relationships** – You must disclose if you or your family hold any directorship, management role, or other special relationship(s) with an outside entity, including not-for-profit as well as for-profit entities, having the potential for personal material gain, if the role or relationship reasonably appears to be related to your institutional responsibilities.
- ❑ **Travel** – Some travel disclosures are required for all investigators. In addition, if you are funded by the PHS or plan to apply for such funding, you must disclose more broadly all reimbursed or sponsored travel that reasonably appears to be related to your institutional responsibilities. Your disclosure must include: the purpose of the travel, the identity of the sponsor or organizer, the duration of travel and approximate value.
 - You should not include:
 - travel funded through the University and charged to a sponsored project or departmental account, or
 - travel that is reimbursed or sponsored by a Federal, state or local government agency, a 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.
- ❑ **Other** – You must disclose any other financial interests held by you or your family that reasonably appear to be related to your institutional responsibilities (e.g., certain intellectual property rights).

What Counts as *Family*?

With regard to COI disclosure, your *Family* includes:

- ❑ Your spouse or domestic partner
- ❑ Your dependent children
- ❑ Your grown children, grandchildren, parents and grandparents (only for those financial interests that are known to you)
- ❑ Any trust, organization or enterprise over which you, alone or together with your family, exercise a controlling or significant interest

What time period does my annual disclosure cover?

Your disclosure covers your Financial Interests held or received in the 12 months preceding the date of your disclosure and those expected over the following 12 months. You must update your disclosure throughout the year whenever your financial interests change. PHS researchers must update disclosures *within 30 days of a new financial interest*.

For more information, visit the [Conflict of Interest and Research section](#) on the [Research Compliance and Training website](#).