Worksheet for preparing your Research Annual Disclosure

What do you need to know before you begin?

This worksheet will help you prepare the information you’ll need to complete your Research Annual Disclosure in the My COI module in Coeus. Collecting the information before you begin your disclosure in Coeus will help you complete it more quickly.

Gather any documentation that will help with identifying any organizations in which you have Significant Financial Interest (SFI), e.g. W-2 forms from organizations other than Northeastern University, 1099’s, quarterly statements showing equity, etc.

You must determine if you have any SFI’s

Significant Financial Interest (SFI) includes the financial interest of the Investigator and also the financial interest of his or her spouse and dependent children when it could reasonably appear to be related to the Investigators Institutional Responsibilities.

Significant Financial Interests that must be disclosed include any of the following (received during the 12 months preceding or anticipated in 12 months following disclosure):

Publicly Traded Entities

☐ Interest or income in or from a publicly traded entity where
  ☐ the aggregate value of Remuneration and any equity interest exceeds $5000
  ☐ the entity is sponsoring any of the Investigator’s research

Non-publicly traded entities:

☐ Interest or income in or from a non-publicly traded entity where
  ☐ aggregate value of Remuneration exceeds $5000 OR
  ☐ any Equity Interests held (includes ownership, stock, stock options, etc.).

Non-profit or Educational Institution:

☐ Aggregate value of income >$5,000 paid for services other than scholarly or academic works.

Foreign organization including but not limited to a corporation, educational institution, research institution, governmental organization, or medical center

☐ Aggregate value of income >$5,000 paid for services other than scholarly or academic works.

Any entity:

☐ Interest in the form of income related to intellectual property rights and interests paid by an entity other than Northeastern University
Significant Financial Interests does not include (do not disclose):

☐ Income from Northeastern University

☐ Income from authorship or scholarly works

☐ Income from seminars, lectures, or teaching engagements sponsored by, or from advisory committees or review panels for, U.S. Federal, state, or local government agencies; U.S. Institutes of higher education; U.S. research institutes affiliated with an institute of higher education, academic teaching hospitals, or medical centers.

☐ Equity Interests in or income from “passive investments,” such as mutual funds and retirement accounts, so long as the Investigator does not directly control the investment decisions for these investment vehicles.

Step 1: Research Annual Disclosure Screening Questions

You will need to answer the following Screening Questions as part of your Research Annual Disclosure:

☐ Will your research be supported by external organizational funding where you, your spouse, or dependent children have Significant Financial Interest (SFI)?
  List any organizations (you’ll need these in Step 2):

☐ Do you own stock or other ownership interests, which in aggregate exceeds $5,000, in a company that provides funds to Northeastern University in support of your Institutional Responsibilities (e.g. teaching, research, committee, or other administrative responsibilities)? Do not consider investments where you do not directly influence investment decisions, such as mutual funds and retirement accounts.
  List any organizations (you’ll need these in Step 2):

☐ Do you own publically traded stock in a company whose business, or any portion thereof, could reasonably appear to be related to your Northeastern University Institutional Responsibilities (e.g. teaching, research, committee, or other administrative responsibilities)? Do not consider investments where you do not directly influence investment decisions, such as mutual funds.
  List any organizations (you’ll need these in Step 2):

☐ Does your funded research reasonably appear to impact an outside organization where you, your spouse, or dependent children have SFI?

☐ In the past/next 12 months, did/will you assign students, post-docs, other University employees to activities supported by your research funds?

☐ In the past/next 12 months, did/will you teach students, post-docs, or other University employees about the products/processed developed, marketed or sold by an outside organization where you, your spouse, or dependent children have SFI?

☐ Do any identified businesses provide funds (gifts, sponsored work, in-kind donations) for your University activities?
☐ Do you have sponsored research projects (incl. Fed. Grants) that could directly/indirectly impact business entity(ies) in which you, your spouse, or dependent children have financial/business interest?

☐ From any organization: In the past/next 12 months, did/will you receive salary, director's fees, consulting payments, honoraria, royalties; or other payments for patents, copyrights or other intellectual property; or any other direct payments exceeding $5,000? Exclude payments for scholarships or academic works.

List any organizations (you'll need these in Step 2):

☐ From any for-profit organization: In the past/next 12 months, did/will you receive salary, director's fees, consulting payments, honoraria, royalties; or other payments for patents, copyrights or other intellectual property; or other direct payments exceeding $5,000 in aggregate? Exclude payments for scholarly or academic works.

List any organizations (you'll need these in Step 2):

☐ From any not-for-profit organizations such as a foundation or professional society: In the past/next 12 months, did/will you receive salary, director's fees, consulting payments, honoraria, royalties; or other payments for patents, copyrights or other intellectual property; or any other payments exceeding $5,000? Exclude payments for scholarly or academic works.

List any organizations (you'll need these in Step 2):

☐ From any privately held organization (not publically traded): do you have stock, stock options, or other equity interest of any value?

List any organizations (you'll need these in Step 2):

☐ From US educational institutions, US teaching hospitals or US research institutions affiliated with US educational institutions: In the past/next 12 months, did/will you receive payments for services, which in aggregate exceed $5,000 (e.g. payments for consulting, board positions, patents, copyrights or other intellectual property)? Exclude payments for seminars, lectures, teaching engagements, advisory committees, review panels, and scholarly or academic works (i.e. peer-reviewed articles or books based on original research or experimentation, published by an academic association or a university/academic press).

List any organizations (you'll need these in Step 2):

☐ From foreign educational institutions, foreign teaching hospitals or foreign research institutions affiliated with educational institutions: In the past/next 12 months, did/will you receive payments for services, which in aggregate exceed $5,000 (e.g. salary, consulting, board positions, patents, copyrights or other intellectual property)? Exclude payments for scholarly or academic works. Do not include any payments or reimbursements made through Northeastern University from foreign organizations. However, payments made directly to you must be reported.

List any organizations (you’ll need these in Step 2):

☐ Do you have subcontracts, purchasing, or other contractual arrangements at Northeastern University with organizations in which you have a Significant Financial Interest?

List any organizations (you’ll need these in Step 2):
**Step 2: Significant Financial Interest (SFI)**

For each Significant Financial Interest identified in the above worksheet, you will need to provide the following information:

- Entity Name
- Public or private organization
- Organization type (e.g. For-profit Organization, Not For Profit)
- Whether the entity sponsors any of your research
- A description of the entity’s area of business focus and specifically your work with the entity
- An explanation of any involvement of students or post-docs under your direction, whether you teach about this entities products/services, and use of any NU facilities relating to your work with this entity

Relationship details (you should enter all that apply)...

- Income from royalties (other than NU), board or advisory memberships, consulting, speaking engagements (exclude US universities, US Federal, State and Local Governments, US Institutes of higher education, Research Institutes affiliated with Institutes of higher education)
- Stock & Equity (any equity in a non-publicly traded company, common stock holdings, stock options)
- Goods purchased from the entity for research and other activities at NU
- Subaward(s) under your direction issued to this entity
- Gifts received

**Step 3: Relationships**

For each of your projects (active awards and pending proposals) and any Significant Financial Interest identified in the above worksheet:

- Describe the relationship between each project (award and pending proposal) and each SFI; you must include any involvement with students, staff and NU resources.

  - If there is no relationship between the work you are performing for this organization and this project, explain how they are different.
Resources in place to assist you:

- FCOI website: [http://www.northeastern.edu/research/raf/fcoi/](http://www.northeastern.edu/research/raf/fcoi/)
- FCOI help: FCOI@neu.edu
- Coeus system help: coeus-help@neu.edu
- Grant Officers: [http://www.northeastern.edu/research/raf/contact/](http://www.northeastern.edu/research/raf/contact/)

Definitions:

**Aggregate Value** is the cumulate or combined value of the Investigator’s financial interest as well as the financial interest of the Investigator’s family.

**Equity Interests** means stock, stock options, warrants, and other existing or contingent ownership interests in a commercial entity.

**Family** means an Investigator’s spouse, domestic partner, and dependent children.

**Financial Conflict of Interest** means a Significant Financial Interest that Northeastern University reasonably determines could directly and significantly affect the design, conduct, or reporting of research.

**Institutional Responsibilities** means the Investigator’s responsibilities associated with his or her Northeastern University appointment or position, such as teaching, scholarship, research, creative activity, service, etc., as defined in the Faculty Handbook.

**Investigator** means the principal investigator and any co-principal investigators for a research project. This includes, but is not limited to, the project director, principle investigator, or any other person, regardless of title or position, who is responsible for the design, conduct, or reporting of research funded by the PHS, or proposed for such funding, which may include, for example, collaborators or consultants.

**Outside Professional Activities** means compensated and uncompensated activities undertaken outside of an Investigator’s Institutional Responsibilities.

**Related Company** means a commercial entity in which the Investigator, alone or in combination with his or her Family, holds a Significant Financial Interest.

**Remuneration** includes salary and payments for services, such as consulting fees, honoraria or paid authorship.