

Disclosure & COI Training

Why must I disclose outside activities, relationships, and interests?

Ensure the honesty and integrity of your U-M research and professional work by disclosing your [outside activities, relationships, or interests](#) (henceforth referred to as “outside activities”) in M-Inform. M-Inform offers a centralized, streamlined way to report outside activities to maintain transparency in your research.

Disclosure of outside activities is also an institutional requirement under U-M policy ([SPG 201.65.1](#)) and [unit policy](#). For **U-M researchers**, it’s also required by the U-M Office of Research, the State of Michigan, and federal agencies (e.g., PHS, NIH, NSF) for sponsored research funding ([COI Policies](#)).

Unreported outside activities may impact both you and U-M by:

- Damaging reputations (professional and/or organizational)
- Introducing bias, or the appearance of bias, into your research
- Increasing the possibility that the results of the research will be questioned
- Losing the ability to conduct research through the suspension/termination of the existing projects and/or through the reduction/loss of future funding opportunities

By disclosing outside activities in M-Inform, you will have done your part to assist in safeguarding research and to demonstrate compliance with U-M and sponsor regulations.

What outside activities, relationships, and interests do I need to disclose?

Report all paid and unpaid outside activities for you, your spouse, domestic partner, and/or dependent children (i.e., family members) with an [outside entity/organization](#) (including foreign institutions, governments, and companies) when:

- The outside activity relies on or utilizes the same expertise as your U-M teaching, research, clinical, and public service responsibilities or is similar to your area of expertise, scholarship, employment; **OR**
- The outside activity has the potential to influence your U-M duties; **OR**
- The outside entity [conducts business with U-M](#).

Even if your U-M appointment is less than full-time or less than 12 months, you are required to report all applicable activities outside your U-M appointment.

Report ([printable version](#))

<p>INTERNATIONAL ENGAGEMENT</p> <ul style="list-style-type: none"> • Appointment, employment, or visiting scholar at a foreign entity (e.g., teaching a class/course, role at start-up, directing a program, lab work, or other services typical for an employee or professor) 	<p>ACTIVITIES/RELATIONSHIPS (PAID AND UNPAID)</p> <ul style="list-style-type: none"> • Consulting • Advisory role (e.g., scientific advisory board, data and safety monitoring board) • Board of Directors, Corporate Officer, Trustee, or other position with fiduciary responsibility
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- Participation in a foreign talent recruitment (or similar) program
- Travel paid or reimbursed by a foreign entity including academic and healthcare institutions, governments, companies, or non-profits (any dollar amount)
- Research support from a foreign entity that did not route through U-M
- Grant reviewer or other advisory services for foreign institutions, organizations, and entities

- Leadership in a professional society
- Appointment, employment, or visiting scholar at a domestic or foreign entity (e.g., teaching a class/course, role at start-up, directing a program, lab work, or other services typical for an employee or professor)
- Speaking engagements (except as noted below)

- PAYMENTS/LOANS/REIMBURSEMENTS**
- Royalties, milestones, option fees
 - Payments from professional societies for services
 - Loans and loan repayment
 - Travel expenses reimbursed directly to you of \$5,000 or more, in aggregate, by a single domestic outside entity in a 12-month period
 - Gifts from outside entities

- OWNERSHIP INTEREST (EQUITY, STOCK, STOCK OPTIONS)**
- Ownership (e.g., stock, stock options, LLCs, etc.) in a company (including start-up companies) related to your U-M role/responsibilities
 - Ownership of 5% or greater of a publicly-traded company that conducts business with the U-M (e.g., purchases, sponsoring research, contracts, etc.)

- INTELLECTUAL PROPERTY (IP)**
- Optioned or licensed IP developed at U-M or outside U-M
 - Software apps marketed by a company
 - Open source IP (e.g. software)
 - Royalties, milestones, option fees

- ADDITIONAL ROLES**
- Research at an outside entity (that is not part of your U-M research)
 - Editor of journals or other publications
 - Expert witness or other legal service
 - Grant reviewer (except as noted below)

Do Not Report (exception examples)

- INTERNATIONAL ENGAGEMENT**
- Visitors/trainees working in your U-M lab
 - Lab space and equipment you utilize at a non-UM site
 - Foreign financial support received by trainees in your lab
- Although you are not required to disclose these activities in M-Inform, you may be required to report them in Current/Pending or Other Support documentation to funding agencies (e.g., NSF, NIH, etc.)

- ACTIVITIES/RELATIONSHIPS**
- Speaking engagement and/or travel (paid or unpaid) that is:
 - Supported by a **U.S.** federal, state, or local government agency
 - Supported by a **U.S. academic institution that is public or non-profit and accredited**
 - Or said academic institution's affiliated hospital, medical center, or research center

PAYMENTS/GRANTS/CONTRACTS

- Payments for service as a **U.S.** federal, state, or local government agency grant/study section reviewer
- Effort (paid or unpaid) on a research or sponsored project routed through U-M (e.g., sponsored research, other sponsored activities, U-M funded research, unfunded agreements, or other payments to U-M resulting from a U-M contract
- Financial support (domestic or foreign) received by trainees in your lab (although foreign support may be required in Other Support reports to funding agencies)
- Domestic travel (under \$5,000 in a 12-month period from a single entity*)
- Travel paid by U-M or yourself

- Professional society
 - Membership
 - Service that is not paid nor involves paid travel
 - Speaking at or travel to national annual meetings, forums, congresses (under \$5,000 in a 12-month period from a single entity*)
 - Activities or relationships that are not related to your U-M expertise
- Reviewer of books or journal articles
- Grant reviewer for U.S. governmental agencies (any dollar amount) or U.S. non-profit entities (under \$5,000 in a 12-month period from a single entity*)

INTELLECTUAL PROPERTY (IP)

- Inventions/IP that have not been optioned, licensed, or reassigned even if there is a patent
- Software apps that are not marketed or sold

OWNERSHIP INTEREST

- Ownership (e.g., stock, stock options) less than 5% of a publicly-traded company that is not related to your U-M responsibilities or research
- Mutual funds, retirement funds, and similar investments where you do not control the investment decisions within the portfolios at the level of specific companies

* Keep in mind that if you travel, speak, and/or perform grant reviews for a single domestic entity multiple times over the course of any rolling 12-month period, the \$5,000 threshold may be exceeded and such activities will need to be reported. Travel, speaking, and/or performing grant reviews for a **foreign entity** should be disclosed, regardless of dollar amount.

How often do I have to disclose?

At least annually at the start of the University’s fiscal year (July 1) and within 30 days of a new outside activity or change to a previously reported activity.

What happens with my disclosure?

Your unit reviews your disclosure for compliance with U-M and unit policies and [conflicts of commitment](#) (time/effort) with your professional duties. A U-M COI Office may also review your disclosures to determine if [conflicts of interest \(COI\)](#) exist between your outside activity and your U-M research, sponsored projects, or intellectual property. If a COC or COI exists, a management plan may be established.

Will my disclosure be private?

Disclosure information is subject to release outside the U-M under the State of Michigan Freedom of Information Act (FOIA) and certain funding agency requirements. Disclosure information may be shared within the U-M, as appropriate.

Who can I contact if I have questions?

Email: COI.Support@umich.edu

Where can I get more information?

- M-Inform instructions: <https://its.umich.edu/academics-research/research/eresearch/m-inform/instructions-resources>
- General COI website and process information: <https://research-compliance.umich.edu/conflict-interest-coi>
- COI Policies: <https://research-compliance.umich.edu/coi-policies>
- Public Health Service (including NIH) financial COI regulations: <https://grants.nih.gov/grants/policy/coi/index.htm>

Training Acknowledgement:

I certify that I have read the training above and understand that it is my responsibility to fully disclose my outside activities, relationships, and interests in accordance with U-M, federal, and other funding sponsors COI policies.

Disclosure Details for Jane Discloser

1. Do you have a spouse, domestic partner, and/or dependent children (i.e., family member) currently employed at U-M?

Yes No [Clear](#)

2. Do you and/or your [family members](#) have any paid and/or unpaid [outside activities, relationships, or interests](#) with an [outside entity/organization](#), foreign or domestic, that:

- Rely on or utilize the same expertise as your U-M teaching, research, clinical, and public service responsibilities; **OR**
- Are similar to your area of scholarship or employment; **OR**
- Have the potential to influence your U-M duties; **OR**
- Are with outside entities that [conduct business with U-M](#).

Yes No [Clear](#)

Add Outside Activity, Relationship, Interest

Pending

View/Edit	Organization	Relationship	Start Date	End Date	Ongoing?	Days	Total Value	Last Updated	Remove
	Pfizer	• Consultant	03/10/2018		Yes	4	\$20,000 - \$39,000	07/07/2019	

Reviewed

View/Edit	Organization	Relationship	Start Date	End Date	Ongoing?	Days	Total Value	Last Updated	Remove
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There are no items to display

Inactive

View/Edit	Organization	Relationship	Start Date	End Date	Ongoing?	Days	Total Value	Last Updated	Remove
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There are no items to display

Select the outside entity/organization involved in this activity, relationship, or interest:

If you are unable to find the outside entity/organization, please enter the legal name of the outside entity/organization:

Disclosure of Outside Entity for Jane Discloser

* 1. To the best of your knowledge, is this a foreign entity (e.g., an institution, government, or company outside the U.S.)?

Yes No [Clear](#)

* 1.2. In what country is this entity located?

* 1.3. Do you perform the work for this entity outside the U.S.?

Yes No [Clear](#)

* 2. Select the choice that best describes this outside entity:

- Publicly Traded Company
- Non-Publicly Traded Company
- Governmental Agency
- Academic Institution
- Non-Profit Organization
- Other

[Clear](#)

* 3. Select who this outside activity, relationship, or interest is for:

- Self
- Family Member (spouse/domestic partner or dependent)
- Both (self and family member)

Disclosure Questions

* 4. Provide the **start/initial** date for the outside activity, relationship, or interest:

* 5. Is this outside activity, relationship, or interest ongoing?

Yes No [Clear](#)

* 5.1 Please enter the end date

* 6. Estimated **professional effort** (in days) engaged in this activity, relationship, or interest for the current fiscal year (ending June 30)

* 7. Provide details about this outside activity, relationship, or interest. Check ALL that apply:

Appointment (e.g., adjunct, honorary, directorship) or visiting scholar arrangement

* Is there a written agreement? Yes No [Clear](#)

* Describe the expectations of your role:

Receipt of grant/research funds not routed through the U-M

* Provide the grant/project titles/names and aims:

Talent recruitment (or similar) program involvement/support (direct or indirect)

* Was the contract with you directly? Yes No [Clear](#)

* Describe the expectations of your responsibilities:

Travel (paid directly or reimbursed to you by the outside entity)

Enter information about each trip on a separate line in the table. Click the Add button to enter trip details. To make changes, click the Update button next to the information to be changed.

+ Add

Date	Duration	Destination (city, state, country)	Purpose	Event Organizer (if other than the outside organization)
There are no items to display				

Intellectual Property (IP) – Outside entity is using Intellectual Property (including software) which you have invented/created or in which you otherwise have an economic interest (e.g. royalties, milestone payments or option fees paid through U-M)

Yes No [Clear](#)

* Is it U-M IP?

* Describe:

Equity interest, ownership, stock, stock options, or partnership interest

5% or greater

Less than 5%

[Clear](#)

Is the dollar value of the equity known? If yes, please include in question 9.

Yes No [Clear](#)

Disclosure Questions

Employee

* Title

* Percent FTE/Effort

Board of director (including non-profits) or leadership/management/fiduciary role (e.g., CEO, President, Vice President)

Board of Directors

Member

Officer (e.g., secretary, treasurer, vice president, president, chair, etc.)

CEO

President

Vice President

Other

* Please describe:

Consultant

* Is there a written agreement? Yes No [Clear](#)

* Describe your consulting role:

Advisor (including scientific, strategic, medical advisory board membership)

* Describe your advisory role and responsibilities:

Name and purpose of the committee(s), if applicable:

Speaking engagements

* Describe the nature of the speaking engagement(s) (e.g., topic, honoraria, relatedness to U-M research):

Teaching a class/course

* Provide the course name(s):

Editor

* Provide name(s) of journal/editorial and specify your role/title(s):

Expert witness or other legal service

* Provide a brief description:

Other (e.g., loan to or from outside organization, volunteer/community service)

Provide details about your interest, activity, or relationship:

8. If there is any other relevant information, please provide.

*** 9. Select the range of the aggregated value received by this entity in the past 12 months (excluding travel):**

*** 10. Is this outside entity/organization...**

* funding or supporting your U-M research program (including salary, supplies, equipment, etc.)?

Yes No [Clear](#)

* providing or supplying a product (e.g., an app, device, drug, compound, software, survey, evaluation) used in your U-M research project(s) either for free (e.g., donated) or at a cost?

Yes No [Clear](#)

* optioning/licensing, or making use of open source (e.g., code, data, schematics, algorithms, software, copyrighted material) [intellectual property](#) developed by you, your spouse/domestic partner, or your dependent children?

Yes No [Clear](#)

* a subcontractor supported by your U-M research?

Yes No [Clear](#)

* involved in your U-M research in a manner not listed above?

Yes No [Clear](#)

* Please explain:

*** 10.1. Does the research involve human subjects?**

Yes No [Clear](#)

Attestation

- I have read and agree to abide by the [U-M policies and guidelines](#) and all applicable sponsor requirements governing outside activities, relationships, and interests, conflicts of interest, and conflicts of commitment.
- The information I provided about my outside activities, relationships, and interests is complete and accurate to the best of my knowledge.
- To the best of my knowledge, the disclosed outside activities, relationships, and interests are allowable under U-M policies, do not interfere with my primary obligations to U-M, and do not involve more than incidental use of U-M resources (e.g., facilities, personnel, equipment, etc.).
- I will update my disclosure promptly (within 30 days) of any change to my previously disclosed outside activities, relationships, and interests or to add a new outside activity, relationship, or interest.
- I understand that I may be subject to disciplinary action up to and including termination of employment for non-compliance with U-M COI policies and outside activity, relationship, and interest disclosure guidelines.
- ***False, fictitious, or fraudulent statements or claims (including omissions) may result in criminal, civil, administrative, sponsor, or U-M actions.***

*Check the box to indicate that you have read the above and accept it:

*Are you ready to submit your disclosure for review?
 Selecting “Yes” and clicking “Save” or “Finish” will immediately submit your disclosure for review.
 If you just wish to save the information you have entered and submit it at another time, select “No” and click “Save” or “Finish”.

Yes No [Clear](#)

Once you accept the attestation above and click FINISH, your disclosure will be routed to the appropriate reviewer.