

**TO:** ALL INVESTIGATORS WITH ACTIVE (FUNDED or UNFUNDED) RESEARCH STUDIES/ GRANTS/ PROJECTS

**FROM:** Heidi Aronin, Institutional Official

**DATE:**  December 13, 2018

**SUBJECT:** Financial Conflicts of Interest in Research - Annual Disclosure CY 2019

The purpose of this announcement is to notify our investigators that we will be rolling out the CY 2019 COI Annual Questionnaire. As you know, the Public Health Services (PHS) regulations regarding Financial Conflicts of Interest (COI) in Research requires all investigators to complete COI training and submit an annual financial disclosure form. As a State facility, and in accordance with SUNY Downstate’s COI Policy and the Research Foundation (RF) COI policies, all Investigators with active research studies *irrespective of funding source* (funded external or “unfunded” internal) must submit the CY 2019 COI Annual Questionnaire.

As you may know, Downstate uses a web- based disclosure filing system, COI SMART, which features a ‘smart form’ that enables users to skip to subsequent questions if there are no new disclosures, speeding the disclosure process. The new CY 2019 form has been auto- populated with the information submitted for CY 2018. Investigators must verify accuracy, update the data, as necessary, and submit for CY 2019.

An Investigator, for COI purposes, is defined as the project director, Principal Investigator, co-Principal Investigator, personnel who are considered to be essential to work performance or any other person, regardless of title or position, who is responsible for the design, conduct or reporting of research. The PI is responsible for identifying all Investigators involved in their research activities. If the role of an individual is unclear and that individual is listed as an Investigator, compliance with all training and filing requirements will be expected. *Transient staff and trainees, such as medical students, residents and fellows, who may recruit patients and/or collect and handle data under supervision, but are not key to the design, conduct or reporting of research are not considered Investigators for purposes of COI. In addition, staff or trainees who merely implement a protocol developed by an Investigator or enter data into an electronic data capturing system are also not considered Investigators for purposes of COI.* For more information, please see the DMC COI website at: <http://www.downstate.edu/coi>.

An automated invitation through Downstate’s email system from the “DMC COI Disclosure” address will be sent on or around December 17, 2018. Please be on the look- out for this invite and complete your disclosure questionnaire within the specified time- frame.

Additionally, in a related, but separate process, please be advised that training requirements will be rolled out in the beginning of CY 2019 for all Investigators who are due to complete COI training (the course must be re-taken every 4 years). For a large facility like Downstate, the collection, discovery and mitigation of conflicts of interest requires the ongoing cooperation of our Department Chairs, Administrators and Investigators.

We thank you in advance for your support and commitment to these requirements.