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Introduction

Old Dominion University is required to have all associated research Investigators submit an annual Conflict of Interest disclosure as well as a Travel Disclosure when applicable.
1  My COI Portal – Access and New COI

1.1  ODU Research Portal
To access the ODU Research Portal, you must have an ODU Midas ID or Guest Account. Once you have your Midas ID or Guest Account, you can navigate to the web address below:


Click on My COI underneath My Menu Options:

Now you will see your respective My Conflict of Interest (COI) Disclosures Dashboard:

Your respective Dashboard may be empty or have a previously entered annual COI disclosure.
1.2 Start a New COI

To fill out a New COI, click on the plus sign at the top right of the Dashboard next to New COI.

You will then see an option for selecting ‘New Annual COI’ or ‘Carryover from Prior Disclosure’. If you have not completed a COI before, you would click on ‘Annual COI’. Once a selection is made, hit Continue.

What type of COI do you want to create?

- New Annual COI
- CarryOver from Prior Disclosure

You will then see the COI Training (Part 1). You must review and then check the Acknowledgement box at the bottom of the screen before you hit Continue. Once you check the box, select Continue.
ODU Significant Financial Interests Disclosure Reporting

PART 1: COI TRAINING

A conflict of interest (COI) disclosure must be completed annually (by February 28th of each year) and within 30 days of discovering or acquiring a new financial interest and/or sponsored travel. Your disclosure should cover the prior 12 months. After you complete your annual disclosure in the ODU Research Portal COI Module, you should continue to update your disclosure throughout the year to add, remove, or modify any outstanding external interests as appropriate. This disclosure form contains a training module that is required to be acknowledged once every 4 years, or unless otherwise directed by the Office of Research (OR) for Compliance, COI Committee (COIC), or sponsoring agency. The training module contains helpful definitions and guidelines for understanding conflicts of interest, your responsibilities, and how to complete this disclosure.

PURPOSE

The ODU-COI disclosure process was developed to promote objectivity and transparency in research and other professional activities by ODU faculty and associated personnel. At the end of this training section, you will understand:

- The federal COI requirements that guide ODU’s research
- COI policy and processes
- What is subject to research COI requirements
- The term “Significant Financial Interest” (SFI)
- Whether and when SFIs must be disclosed
- How SFIs are reviewed at ODU
- The term “Financial Conflict of Interest” (FCO)
- How FCOSs are managed
- How FCOSs may be reported to sponsors and to the public
- Implications for noncompliance with research COI requirements

DEFINITIONS

Investigator: Includes the Principal Investigator (PI), Co-Investigator (Co-PI), Collaborator (C), and any other key personnel, regardless of title or position, who is responsible for the design, conduct, or reporting of research. The PI for any research activity conducted at a University entity must be a University employee or Old Dominion University Research Foundation (ORD) employee, or, under appropriate circumstances (e.g., USG Graduate Fellowship, graduate student, post-doc, research assistant), Co-PIs are key personnel who have responsibilities that are similar to that of a PI on research projects. While the PI has ultimate responsibility for the conduct of a research project, the Co-PIs are also obligated to ensure the project is conducted in compliance with applicable laws and regulations and institutional policy governing the conduct of sponsored research. Note: The investigator who is an investigator on a project.

Immediate Family Member: A spouse, any other person residing in the same household as the investigator who is dependent on the investigator for financial support, or any dependent of the investigator. If the investigator is a dependent, the immediate family member is any dependent of the investigator.

Immediate Family: For the purposes of this definition, immediate family includes the investigator, his or her spouse, and any other person who resides in the same household as the investigator or is dependent on the investigator for financial support, or any dependent of the investigator.

Significant Financial Interest: A significant financial interest means the receipt of an investigator or an investigator’s immediate family member of anything of monetary value, including but not limited to the following, provided that appears to reasonably related to the investigator’s institutional responsibilities:

- Nonpublicly traded entity: If the value of any remuneration received from any foreign or domestic, nonpublicly traded entity over a 12-month period, when aggregated, exceeds $5,000, or when the investigator or the investigator’s immediate family member holds an equity interest.

- Publicly traded entity: Any equity interest, including stock options in any foreign or domestic publically traded entity held by an investigator and the investigator’s immediate family members, that, when aggregated, exceeds 5% ownership interest in any single entity or a current value of $5,000, as determined through reference to public prices, recent financing events, or other reasonable measures of fair market value.

- Salary, consulting fees, honoraria, royalties, and other payments received directly from a single outside entity that, when aggregated for the investigator and the investigator’s immediate family members, exceeds $5,000 over a 12-month period.

- Any sponsored or reimbursed travel related to institutional responsibilities, regardless of size; amount.

- Any income received from a business in which the investigator has an ownership interest in the business exceeding $5,000 over a 12-month period.

- Any income received from all other sources in which the investigator has an ownership interest, regardless of size; amount.

- Any interest in a business that, when aggregated for the investigator and the investigator’s immediate family members, exceeds $5,000 over a 12-month period.

- Any income received from a business in which the investigator has an ownership interest in the business, regardless of size; amount.

- Any interest in a business that, when aggregated for the investigator and the investigator’s immediate family members, exceeds $5,000 over a 12-month period.

1.3 Fill out Part 1: COI Disclosure Questionnaire

There are 17 questions within the COI Disclosure Questionnaire. All 17 questions are required to have a response. If YES is selected for a question, there will be additional sub-questions related to the main question. If NO is selected for a question, you can move on to the next question. There is also an area at the bottom of the questionnaire to add supporting documentation.
Part 1: COI Disclosure Questionnaire

Question (1 of 17)

- **YES**
- **NO**

Do you currently have, or have you had in the past 12 months, any active academic, professional or institutional appointments at an organization other than ODU/ODURF?

*Consistent with federal sponsor requirements, please mark “yes” if you have held any titled academic, professional or institutional appointments, regardless of whether remuneration is received and whether the appointment is full time, part-time, or voluntary (including adjunct, visiting, courtesy, or honorary). Do not include serving as an invited guest lecturer or external reviewer/examiner (e.g. of a student dissertation/thesis) if there is/was no ongoing commitment or relationship.*

*Note: If you have been at ODU/ODURF ≤ 12 months, limit your response to reflect appointments that have been active since your ODU / ODURF start date.*

Question (2 of 17)

- **YES**
- **NO**

Do you or a family member currently own a business?

Question (3 of 17)

- **YES**
- **NO**

Do you have access to research/laboratory space, equipment, facilities, or the services of research support staff, including student assistants, at a location other than ODU that is not associated with an ODU/ODURF sponsored program or other ODU/ODURF research agreement?

Question (4 of 17)

- **YES**
- **NO**

During the period of your employment at ODU, have you been named as an inventor on any patent or patent application other than those submitted on ODU's behalf by the ODURF?

If you select YES for a question, you will be required to answer the sub-questions for each External Entity that you are associated with outside of ODU. For example, if you are associated with External Entity 1 and External Entity 2, you will need to add 2 Entries of sub-questions to complete the overall Question.
**Question**

☐ YES  ☐ NO

Do you currently have, or have you had in the past 12 months, any active academic, professional or institutional appointments at an organization other than ODU/ODURF?

_**Consistent with federal sponsor requirements, please mark “yes” if you have held any titled academic, professional or institutional appointments, regardless of whether remuneration is received and whether the appointment is full time, part-time, or voluntary (including adjunct, visiting, courtesy, or honorary). Do not include serving as an invited guest lecturer or external reviewer/examiner (e.g., of a student dissertation/thesis) if there is/was no ongoing commitment or relationship.**_

_**Note: if you have been at ODU/ODURF < 12 months, limit your response to reflect appointments that have been active since your ODU/ODURF start date.**_

**Entry #1**

1. **In the space below, provide the following information for each external appointment:**

   - **Name of institution**
     Restaurant X

   - **Country**
     Germany

   - **Title or role**
     Board Member

   - **Briefly Describe Your Duties/Responsibilities (e.g., course instructor, mentor students/trainees, develop instructional materials, conduct research, lead/supervise research team, etc.)**
     I am on the board of directors. We reviewed financials each year.

   - **Time/Effort Commitment (e.g., person months) and Timing (e.g., summer-only or intermittent throughout the year)**
     Monthly
You can add as many Entries as needed. You also have the ability to Delete Entries as well.

Once you have completed all 17 Questions, you will need to upload any Supporting Documents. You can do that in the Supporting Documents section near the bottom of the page by selecting Choose File, finding the file, and double clicking on that file, and then clicking Upload Attachment.
After you have uploaded your supporting documentation, you have the option to **Save and Submit Later**, OR go to **Next Step**, OR **Cancel**.

If you hit **Save and Submit Later**, you will then be taken back to the My COI Disclosures Dashboard.

The Dashboard contains additional data about your respective COI Disclosure including:

- Version # (V#)
- Disclosure Type
- Disclosure Status
- Created On
- Submitted On
- Review Status
- Disposition
- CMP Status
- COI Expires On
- COI Action(s)
- Training Expires On
To **Edit and Submit** your COI for Review, click on the word **Edit** underneath COI Action(s) in the Dashboard. Scroll down to the bottom of the page after you have updated each of the Questions that needed more information. Select **Next Step**.

### 1.4 Fill out Part II: Project Declarations

After completing Part 1 and hitting **Next Step**, you will then see Part II: Project Declarations. All the active projects, including those in which the period of performance has ended but are actively being closed out (inactive), within the ODU Research Portal that you are assigned to will automatically be displayed on the screen. If you are not assigned to any projects, then the screen will say **“You are not assigned to any projects and therefore this step is not required. Click Next Step to go to the next page.”**

#### Part II: Project Declarations

*Instructions: Please identify your relationship with each entity and provide additional supporting comments as needed.*

<table>
<thead>
<tr>
<th>TRANS CARBON 100805-010</th>
</tr>
</thead>
<tbody>
<tr>
<td>NSF2020 100879-010</td>
</tr>
<tr>
<td>LINKING OPTICAL 100928-010</td>
</tr>
<tr>
<td>ADENOSINE TRIPH 100996-010</td>
</tr>
</tbody>
</table>

For each Project and respective Entity that you are associated with, you will need to fill out the Relationship and add any relevant comments and then hit **Save**. The relationship options are as follows:

- **Not Related** – i.e., your outside engagement in activity/financial interest is not related to your research project and academic or professional expertise.
- **No Conflict Exists** – i.e., situations where any financial interest held by an Investigator or an Investigator’s family is below the threshold for Significant Financial Interest and where the situation suggests no actual, potential, or perceived Conflict of Interest. These situations may continue without special safeguards or oversight.
- **Potential Relationship** – i.e., your outside activities or interests present a potential or perceived Conflicts of Interest with your research project and academic or professional expertise, which may represent Conflict of Interest, but in many cases would be permitted to go forward after disclosure with a Management Plan.
- **Relationship Identified** – i.e., actual Conflict of Interest with your outside activities or interests, which may be permitted to go forward after disclosure only with an appropriate Management Plan to eliminate the conflict, safeguard against prejudice toward University activities, and provide continuing oversight.
Once you have completed the updates for each Project and hit **Save** for each Project, then you will see green check marks next to each project as well as a **Next Step** button appear at the bottom right of the screen. Hit **Next Step** to move on.

### Part II: Project Declarations

Instructions: Please identify your relationship with each entity and provide additional supporting comments as needed.

#### TRANSCARBON 100805-010
- **NSF2026 100879-010**
- **LINKING OPTICAL 100928-010**
- **ADENOSINE TRIPH 100990-010**

#### TRANSCARBON — 100805-010
- **Project Role:**
- **Sponsor:**
- **Entity #1:**
  - **Restaurant X**
  - **Relationship:**
  - **Not Related**
- **Comments**
- **Entity #2:**
  - **JMU College Board**
  - **Relationship:**
  - **Relationship Identified**
- **Comments**

**Save**

### 1.5 Part III: Acknowledgement and Certification

Once you hit **Next Step** on Part II, it will take you to Part III: Acknowledgement and Certification. Here you will review and digitally sign the Acknowledgement page for your respective Conflict of Interest Disclosure.
**Part III: Acknowledgement and Certification**

**Acknowledgement**

Further, I agree:
- To update this disclosure between annual disclosures at the time the potential for a conflict is first identified.
- To cooperate in the development of a Management Plan, should one be necessary to manage, reduce, or eliminate actual, potential, or perceived conflicts of interests.
- To comply with any conditions or restrictions imposed by the University to manage, reduce, or eliminate actual, potential, or perceived conflicts of interest or to forfeit the award.

By typing my name in the text box/digitally signing below, I certify that my answers on this Research Conflict of Interest Disclosure are complete and accurate to the best of my knowledge and belief.

I understand that this Disclosure is required to obtain funding from the U.S. Government. I, [Full Name and Title], certify to the best of my knowledge and belief that the information contained in this Disclosure Statement is true, complete, and accurate. I understand that any false, fictitious, or fraudulent information, misrepresentations, half-truths, or omissions of any material fact, may subject me to criminal, civil or administrative penalties for fraud, false statements, false claims, or otherwise. (18 U.S.C. §§ 1001 and 287, and 31 U.S.C. 3729-3730 and 3801-3812). I further understand and agree that (1) the statements and representations made herein are material to U.S. Government’s funding decision, and (2) I have a responsibility to update the disclosures during the period of performance of the award should circumstances change which impact the responses provided above.

I have acknowledged that I have read, understood, and will comply with the ODU University Conflict of Interest Disclosure Policy.

My Signature

Jane Doe

---

You must select the Check Box and write your Name in the Signature Box. Then select **Submit for Review**. Once you select **Submit for Review**, your COI Disclosure will be submitted, and you will be taken back to the My COI Disclosures Dashboard.

**My Conflict of Interest (COI) Disclosures**

At the Dashboard, you will see that you now have a Submitted On Date, an updated Disposition and an option to View your respective COI. Your COI Disclosure will be locked for editing until it has been reviewed and processed by the ODU AVP for Compliance and/or the COI Committee. Your COI Disclosure may be returned to you if more information is requested by the ODU AVP for Compliance or the COI Committee. Once it has been reviewed and processed, you will have the ability to update your disclosure. **Update** gives you the option to create a new version (copy) of the original and make changes as needed so that there is a historical tracking...
of changes. If you update your disclosure, your respective COI Disclosure will then be locked and again move through the necessary reviews. You will be able to see the **Review Status** in the middle of the Dashboard.

<table>
<thead>
<tr>
<th>V#</th>
<th>Disclosure Status</th>
<th>Created At</th>
<th>Disclosure Type</th>
<th>Submitted On</th>
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<th>Training Expires On</th>
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<tr>
<td>2024-A2</td>
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<td></td>
<td>AIP Committee</td>
<td>Positive</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
2 New Travel Disclosure

2.1 Start a New Travel Disclosure
If you have a Department of Energy (DOE) or Public Health Services (PHS) projects and you have travel (any amount) that is being reimbursed or sponsored, you will be required to fill out a Travel Disclosure upon your return. To do this, you will navigate to your My COI Dashboard and then click on the plus sign at the top right corner next to New Travel Disclosure.

You will then be taken to the Travel Disclosure screen where you will need to fill out any sponsored/reimbursed travel and upload any supporting documentation.

Travel Disclosure
Please enter your travel reimbursements for each Project below
After entering in the specific travel and who it was Reimbursed By, then you will be taken to Part II: Travel Declarations. Here you will need to specify the Discloser Relationship and any supporting comments for each Project that you are associated with.

After you have filled in the Discloser Relationship and Comments for each Project and hit SAVE for each, you will then see the Next Step button appear.

Once you click on Next Step, you will then be taken to Part III: Acknowledgement and Certification for your respective Travel Disclosure. Here you will need to check the Acknowledgement box and enter your name under My Signature. Then hit Submit for Review.
Once you hit Submit for Review, you will be taken back to your respective My COI Disclosures Dashboard. You will now see your respective Travel Disclosure Submitted for Review.

You will now be able to see the Review Status for both your Annual and Travel disclosures.
Secure and Regulated Research Officer (SRRO) Review

As a Secure and Regulated Research Officer (SSRO), you will navigate to the ODU Research Portal and see that you have both ‘My COI’ and ‘COI Dashboard’ in your My Menu Options.

Click on the COI Dashboard to view all the entries to date as well as search for specific entries.

Conflict of Interest Dashboard

To Return to the Portal, click on the ‘HOME’ button at the top left of the screen.
Once you are back to the HOME screen of the Portal, you can then click on My COI. As an SSRO, the My COI page will include both your respective COI Disclosures as well as SRRO Pending Disclosures.

As an SSRO, you will click on ‘Review’ at the right side of each Disclosure to perform your respective review. Once you hit Review, you will then be taken to the entire COI Disclosure (Parts I – III). The answers will be in Read-Only mode, but you will have access to edit the SSRO Review section near the bottom.

Once you have entered the determination and comments, then hit Submit Review. Now the SRRO Pending Disclosures table will reflect one less review pending.
4 Associate Vice President (AVP) for Compliance Review

As the Associate Vice President (AVP) for Compliance, you will navigate to the ODU Research Portal and see that you have both ‘My COI’ and ‘COI Dashboard’ in your My Menu Options.

Click on the COI Dashboard to view all the entries to date as well as search for specific entries.

Conflict of Interest Dashboard

To Return to the Portal, click on the ‘HOME’ button at the top left of the screen.
Once you are back to the HOME screen of the Portal, you can then click on My COI. As an AVP, the My COI page will include both your respective COI Disclosures as well as AVP for Compliance Pending Disclosures.

My Conflict of Interest (COI) Disclosures

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<tr>
<th>Disclosure Type</th>
<th>Disclosure Status</th>
<th>Created On</th>
<th>Submitted On</th>
<th>Review Status</th>
<th>Disposition</th>
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<th>COI Actions</th>
<th>Training Expires On</th>
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<tr>
<td>2024-A2</td>
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<td>11/30/2023</td>
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</tr>
<tr>
<td>2024-F1</td>
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<td></td>
<td>Positive</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

As an AVP, you will click on ‘Review’ at the right side of each Disclosure to perform your respective review. Once you hit Review, you will then be taken to the entire COI Disclosure (Parts I – III). The answers will be in Read-Only mode, but you will have access to edit the AVP Review section near the bottom.

AVP Review

Once you have entered the determination and comments, then hit Submit Review. Now the AVP for Compliance Pending Disclosures table will reflect one less review pending.
5 COIC Committee Review

As a COIC Committee Member, you will navigate to the ODU Research Portal and see that you have both ‘My COI’ and ‘COI Dashboard’ in your My Menu Options.

Click on the COI Dashboard to view all the entries to date as well as search for specific entries.

Conflict of Interest Dashboard

To Return to the Portal, click on the ‘HOME’ button at the top left of the screen.
Once you are back to the HOME screen of the Portal, you can then click on My COI. As a COIC Committee Member, the My COI page will include both your respective COI Disclosures as well as Committee Pending Disclosures.

My Conflict of Interest (COI) Disclosures

As a COIC Committee Member, you will click on ‘Review’ at the right side of each Disclosure to perform your respective review. Once you hit Review, you will then be taken to the entire COI Disclosure (Parts I – III). The answers will be in Read-Only mode, but you will have access to edit the Committee Review section near the bottom.

Committee Review

Conflict Management Plan

To be added

Once you have entered the determination, comments, and addressed any Conflict Management Plans, then hit Submit Review. Now the Committee Pending Disclosures table will reflect one less review pending.
6 University Council Review

As a University Council Member, you will navigate to the ODU Research Portal and see that you have both ‘My COI’ and ‘COI Dashboard’ in your My Menu Options.

Click on the COI Dashboard to view all the entries to date as well as search for specific entries.

Conflict of Interest Dashboard

To Return to the Portal, click on the ‘HOME’ button at the top left of the screen.
Once you are back to the HOME screen of the Portal, you can then click on My COI. As a University Council Member, your respective My COI page will include both COI Disclosures as well as University Council Pending Disclosures.

My Conflict of Interest (COI) Disclosures

<table>
<thead>
<tr>
<th>Disclosure Type</th>
<th>Status</th>
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<th>Submitted On</th>
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<th>COI Action(s)</th>
<th>Training Expires On</th>
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<tr>
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<td>2024-71 Travel</td>
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<td>11/30/2023</td>
<td>11/30/2023</td>
<td>+ Not Reviewed</td>
<td>Positive</td>
<td>+ Not Reviewed</td>
<td>+ Not Reviewed</td>
<td>+ Not Reviewed</td>
<td></td>
</tr>
</tbody>
</table>

Showing 1 to 2 of 2 entries

As a University Council Member, you will click on ‘Review’ at the right side of each Disclosure to perform your respective review. Once you hit Review, you will then be taken to the entire COI Disclosure (Parts I – III). The answers will be in Read-Only mode, but you will have access to edit the Committee Review section near the bottom.

University Council Review

Comments: Adding Comments as part of my Review

Submit Review

Once you have entered the determination and comments, then hit Submit Review. Now the University Council Pending Disclosures table will reflect one less review pending.
7 Sponsored Program and Administration

As Sponsored Program and Administration role, you will navigate to the ODU Research Portal and see that you have the 'COI Dashboard' in your My Menu Options.

Click on the COI Dashboard to view all the entries to date as well as search for specific entries.

Conflict of Interest Dashboard

- \(\text{!} = \text{COI expired}\)
- \(\text{✓} = \text{No expirations or terminations, in good standing}\)
- \(\boxed{\text{Active CMP}}\)
- \(\boxed{\text{Active CMP/RF Compliance Required}}\)
- \(\text{TBD} = \text{PI/Co-PI/Key Personnel terminated}\)

You can search by project number, Midas ID, or PI first and/or last name.

To Return to the Portal, click on the ‘HOME’ button at the top left of the screen.