

Using the NBER Significant Financial Interest Disclosure System

The NBER Research Disclosure System can be found at: fcoi.nber.org/fcoi/

To utilize the system, you will need a user name and a password. The NBER will create an account for you in the COI system. Your user name will be the same user name you use to access the NBER web site.

When your account is created, you will receive a notification email including your user name and a temporary password. You will be required to reset your password when you first log into the system.

If you ever forget or lose your password, please notify your grant administrator, who can reset it for you.

Regulations developed by various funding agencies require researchers to submit a "research initiated" disclosure certification in connection with any proposal submission. In addition, researchers need to complete an annual disclosure certification for each year in which they have an active research grant, and they must update their disclosures within the year in response to changing personal circumstances.

When it is time for an annual certification or research initiated certification, you should receive an e-mail from the NBER with a link that will enable you to complete your certification. You can also log into the COI system and see the certification in the Inbox of your personal page, which is the page you will access when you log in. This page provides a dashboard for managing your certifications.

The NBER follows a two-stage disclosure process. In the first step, all researchers are asked to disclose their Significant Financial Interests (SFIs) by entity, to indicate the nature of their interests (i.e., stock and equity ownership, consulting relationship, board membership, etc.), and to report whether the total value of their financial interest in this entity is valued at more than \$5,000. In this step, researchers do not need to disclose the specific monetary value of their SFIs, just whether those values exceed \$5,000. In the second step, after NBER review of the disclosures from the first step, some researchers may be asked for further details about their SFIs. There is an important distinction between researchers funded by grants from the Public Health Service (which includes NIH) and those with other grants. The former must disclose all of their Significant Financial Interests, and the NBER must determine whether they are grant-related. The latter may disclose only those SFIs that bear on their research project, provided that they indicate in advance to the Director of Research and Grants Management (Alterra Milone) that they would like to follow this route, and receive approval to do so.

The web-based system will prompt users for information about each SFI they report, and it will then aggregate these SFIs for review and certification by the NBER in its role as the organization that supervises the research project.

It is possible to enter some SFIs, store that information in the system, and return at a later time to complete the disclosure information. When a user finishes entering all SFI information, the system will provide a prompt that allows the information to be submitted for NBER review. To assist in developing a complete accounting of SFIs, it can be helpful to review consulting agreements, receipts from travel that was reimbursed by corporations or any entity other than a U.S. college or university or the NBER, stock holdings, tax returns, and related financial information.

The following step-by-step guide describes the process for submitting your annual or research-initiated disclosure for review.

Section A: Submitting Your Annual or Research Initiated Disclosure

A.1. Log on to your site and click **My Home** if you are not already there. You can also click on the link within the e-mail you receive from the NBER. *If you click on the link in your e-mail, you'll go directly to the disclosure certification workspace. You can skip step 1-2 of this procedure.*

A.2. From the **Inbox** tab, click on the name of your certification to open it.

A.3. From the disclosure certification workspace, click the **Edit Disclosures** button.

A.4. Respond to the questions about your responsibilities at the NBER. The answers you provide help determine whether your disclosure(s) need to be reviewed. When you're done, click **Continue**.

A.5. Read the instructions on what to report and what to exclude from your disclosures. If you have not read the full text of the NBER Research FCOI Policy, please follow the link http://www.nber.org/COI/NBER_ResearchFCOI_Policy.pdf to do so.

A.6. Check the box indicating you have read and understood the NBER Research FCOI Policy.

A.7. Indicate whether or not you or an immediate family member have a financial relationship with any outside organization or company as described above, by checking yes or no. When you are done, click **Continue**. *If you indicated no outside relationships, you will skip to step A.13.*

A.8. Click the **New Disclosure** button to disclose information for a new organization.

A.9. In the **Select the External Organization** box, start typing the name of the organization for this disclosure. The system will find a match as you type. When you are done entering the organization, click **OK**. *If there is no match, you can manually type the name of the organization into the bottom box on this form.*

A.10. Complete the General Information form with information specific to your relationship with the particular external organization. Click **Continue** to return to the Disclosure Details page. The information you entered should now be summarized in Table 1, Disclosures Under Review.

A.11. If you need to disclose information for a different organization, click the **New Disclosure** button again and repeat the above steps. If you have nothing further to disclose, click **Continue** to complete the certification forms.

A.12. If this is a research initiated disclosure, complete the Research Information form and then click **Continue**.

A.13. When you get to the last page, you will see a certification assurance message. Click **Finish** to save the certification.

A.14. You will be returned to the certification's "workspace," the summary page. Click **Submit** under the My Current Actions menu on the right hand side to submit to the NBER for review.

A.15. A new window will open up and you will be asked to certify that all your information is correct. Check the box to indicate your agreement and then click **OK** to submit to the NBER for review.

NBER Requests Additional Information

Any disclosed significant financial interests will be reviewed by the Director of Research and Grants Management (DRGM) and the NBER President prior to the NBER's expenditure of funds. If upon initial review, the DRGM and the President determine that a disclosure requires further examination, the investigator will be asked to provide additional details about the relationship(s) with the entity and to provide more detailed information on the value of the Significant Financial Interest in question. If the NBER requests changes or additional information about any SFIs, the researcher will be asked to edit and to update information included in the disclosure review. The system will retain the initial disclosure data, so providing additional information should be relatively straightforward. A researcher who is asked to provide such information in a "step two" review will receive an email from the disclosure system requesting additional data. After receiving such an email, the researcher can log on to the COI system and enter the information that is needed to address the "step two" request.

Section B: To Edit a Disclosure Certification

- B.1.** Log on to your site and click **My Home** if you are not already there. You can also click on the link within the e-mail you receive from the NBER.
- B.2.** From the **Inbox** tab, click on the name of your disclosure certification project to open it. If the disclosure certification project is not in your Inbox, then it is not available for you to make changes. It might, for example, be under review. In this case, you need to email fcoi@nber.org to have it returned to you.
- B.3.** Follow steps A.3.-A.7. in the previous section on submitting a disclosure for annual or research initiated certifications. The system treats the certification as if it is a paper form to be edited, you will see each page you previously completed for the certification.
- B.4.** Click the **Edit** button next to the disclosure specified in the email you received regarding additional information. You may notice that the total value of your disclosure has been reset to \$0, rather than \geq or $<$ \$5000.
- B.5.** Update the General Information form with information specific to your relationship with the particular external organization if requested. Click **Continue**.
- B.6.** Click **Continue** to move through each form presented. You will see one form page for each type of financial relationship you selected on the General Information page. When you get to the end of the disclosure forms, you should see a disclosure summary that presents, in tabular form, all the information you've provided. *It looks like this.*
- B.7.** Click **Finish** to save disclosure forms for the current organization. When you're done, you'll return to your certification workspace to complete the submission process.
- B.8.** Follow the steps beginning with A.11. above.

Section C: Updating Individual Disclosures

As a grantee, if your Significant Financial Interests change during the year, you must update your disclosures to reflect your changing circumstances. This is done by submitting an update certification. If the updates qualify as significant, new disclosures that have not been previously submitted will be included in a certification review process.

- C.1.** Log on to your site and click **My Home** if you are not already there.
- C.2.** On the left side of your personal page, click the **Manage Certification** button.

C.3. On the Update My Disclosures form, explain why you are updating your disclosures and click the **OK** button.

C.4. Use the provided form to answer questions about your responsibilities at the NBER. The system will default to the answers that you previously provided. The answers you provide help determine whether your disclosure(s) need to be reviewed. When you're done, click **Continue**.

C.5. Read the instructions on what to report and what to exclude from your disclosures. If you have not read the full text of the NBER Research FCOI Policy, please follow the link http://www.nber.org/COI/NBER_ResearchFCOI_Policy.pdf to read it.

C.6. Check the box indicating you have read and understood the NBER Research FCOI Policy.

C.7. Indicate whether or not you or an immediate family member have a financial relationship with any outside organization or company as described above, by checking yes or no. When you are done, click **Continue**.

C.8. You are now in the Disclosure Details page.

Adding New Disclosures

If you have never reported any relationship with the organization that accounts for your new SFI, you'll need to create a new disclosure for it. Follow steps A.8.-A.10.above.

Editing Disclosures Under Review

If a disclosure is under review and the review is accessible for you to modify it, the disclosure appears with an Edit button next to it. If a disclosure is under review by the NBER staff, the disclosure appears with a View button next to it and you cannot make changes.

Editing Previously Reviewed Disclosures

If the nature of your relationship with an organization changes, you might need to go back and modify a previous disclosure. All of your disclosures are displayed on the Disclosure Details form. If the disclosure in question has been previously reviewed, it will appear at the bottom of the form. If you need to make changes to it, you can click the Modify icon next to a disclosure to move it into the current certification project and modify it.

As soon as you modify a previously reviewed disclosure, it becomes part of the current certification process. That means that the COI system will analyze your changes and determine whether they need to be sent to the COI office for review.

Removing Individual Disclosures

At some point, you might need to remove a disclosure from the system. When you no longer have any payments from or equity with an organization, you can deactivate the disclosure

associated with it. This can be done at any time. It doesn't matter whether the disclosure is part of the current certification project or not.

When you deactivate a disclosure, it's not actually removed from the system. It goes into a state called Pending Removal. An NBER administrator must approve the deactivation before it's actually removed from your set of disclosures. Until the analyst approves it, you'll continue to see the disclosure in your list.

C.9. If you have nothing further to disclose, click **Continue** to complete the certification forms.

C.10. When you get to the last page, a certification assurance message is displayed. Click **Finish**.

C.11. You will be returned to the certification's "workspace," the summary page. Click **Submit Changes** under the My Current Actions menu on the right hand side to submit to the NBER for review.

Section D: Creating a Print-Out of your Disclosure Certification Forms

If you need a paper-based copy of your disclosure review, you can generate one using the COI System. Using the Printer-Friendly button in the workspace, you can create a read-only version of all your disclosure certification forms with any values you have currently provided.

D.1. Log on to your site, fcoi.nber.org/fcoi/.

D.2. In the top navigator, click **COI**.

D.3. On the COI page, click the **My Certifications** tab. From the list of certifications, click the name of the one you want to open.

D.4. Click the **Printer Version** button in your workspace.