Using the NBER Significant Financial Interest Disclosure System

The NBER Research Disclosure System can be found at: https://nber.app.cayuse.com/

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, you can request it be reset here by providing your user name. Detailed instructions appear at the bottom of this document. If you have any difficulty resetting the password please notify your grant administrator.

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 email from the NBER with a link that will enable you to complete your certification. You can also log into the COI system and see your certifications under My Profile. Logging in takes you to the My Tasks page and My Profile is available by selecting the down arrow next to your name in the upper right, 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) 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.

Submitting Your Annual or Research Initiated Disclosure

- Log on to the Cayuse website and you will automatically be directed to your home page with a "My Tasks" dashboard. You can also click on the account creation link within the email you receive from the NBER and it will take you directly to step 3 below.
- 2. From the Cayuse home page, click on your name to open the user menu. Then click on My Profile.
- 3. On the My Profile page, click on the "COI Disclosures" menu item on the left, and you will be able to see any disclosures assigned to you. You can click on the disclosure name to start filling out the disclosure form.
- 4. As you go through the disclosure form, Cayuse will pull in information from previously completed disclosures into your current form. <u>Users will need to click on Review & Accept to confirm the previously reported significant financial interests.</u>

You can also select Delete Relationship, if the information is no longer relevant. NOTE: Cayuse saves form data automatically, so delete relationships carefully.

5. Once you have completed and submitted the respective disclosure form, the status on your COI Disclosures page will change to "Disclosure Completed" if your disclosure does not need further review, otherwise it will change to an "Under Review" status.

Submitting a New Disclosure

If you do not have any disclosures assigned, you can select the New Disclosure button at the top right.

If you choose to start a new disclosure, you will be prompted to choose to start a new annual disclosure or a new research-based disclosure. Please be sure to select Start a new Annual disclosure.

Complete the Annual Disclosure Form and hit Submit when finished.

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.

**Two situations where additional information is required: no information given; is the COI worth >\$5000.

To Modify a Disclosure Certification (Annual or Research-Based)

- 1. Log on to the Cayuse website and from the home page, click on the menu in the top right and navigate to My Profile.
- 2. On the My Profile page, select the COI Disclosures menu item on the left. You can now see all the disclosures for your account.

To edit a submitted disclosure, click on the modify button to the right of the disclosure.

To edit an unsubmitted disclosure, simply click on the disclosure name.

Resetting Your Own Password

If you forget your password, you will need to perform the following steps in order to reset it:

- 1. Go to your institution's Cayuse login page.
- 2. Click on the "Forgot Your Password" link under the password box.
- 3. Enter your username and click on the "Reset My Password" button.
- 4. You will now receive an email walking you through the steps to reset the password.
- 5. Once successfully changed, you will be logged into the Cayuse system with your new password.

If you do not receive an email within a few minutes, then reach out to fcoi@nber.org for them to reset your password.