

Procedures: Conflict of Interest: How To

An annual notice of the Conflict of Interest (COI) survey is issued in February of each year.

Disclosure Requirements

All eligible personnel must complete a Syracuse University COI Disclosure Form according to the following requirements:

- No later than at the time of research funding proposal submission (i.e., one cannot submit a grant proposal if a current disclosure is not on file with the Office of Compliance);
- Annually between February 1 and February 28 or upon request by the Office of Compliance; or
- Within 30 days of discovering or acquiring a new significant financial interest (e.g. through purchase, marriage or inheritance).

Additional Disclosure Requirements for Researchers

In addition to the COI survey disclosure requirements, researchers who, regardless of title or position, are responsible for the design, conduct, or reporting of externally funded projects or proposed for such funding as designated by the Office of Sponsored Programs, will be prompted to answer additional Financial Conflict of Interest (FCOI) questions as required by federal regulations and guidance.

What has to be Disclosed?

All perceived or actual conflicts that impact the individual's relationship with the university and any other entity, organization or individual must be reported based on the parameters defined in each survey question.

For Financial Conflicts of Interest the following **must** be disclosed:

- Relationships and activities that are related to your Syracuse University Sponsored Research responsibilities
- Any financial interests in an organization that is related to your sponsored research at Syracuse University (consulting, advising, speaking)
 - This applies if the organization is related to your field or could benefit from your professional expertise
- Ownership of, or investment in, a start-up company related to your field even if it is not currently worth anything
 - You must disclose within 30 days of the investment, the filing paperwork as a founder, or the acquisition of ownership interest (options, shares, etc.)
- Current academic appointments or salary outside of Syracuse University (does not apply to salary from previous academic appointments before arriving at SU)
- Use of Syracuse University resources for outside activities (including staff, software, equipment and/or instruments, lab or research space, or confidential information)

For Financial Conflicts of Interest you **should not** disclose:

- Salary, royalties, or remuneration paid by Syracuse University
- Salary from a previous academic appointment or institution prior to your start date at Syracuse University
- Service on an NIH study section, or NSF grant review panel. Service for federal sponsors is exempt from disclosure
- Grants or sponsored research funds that you received while at Syracuse University that went through the Office of Sponsored Programs
- Sponsored or reimbursed travel paid by a federal, state, or local government agency, institution of higher education, academic teaching hospital, or research institute
- Mutual funds or other retirement holdings that you do not actively manage or stocks that are unrelated to your research at Syracuse University
 - For example, Starbucks, Adobe, Target, etc...

Reporting Process

Conflicts of Interest are reported annually through the secure MySlice portal via the 'Conflict of Interest Survey' tile on the employee Home Page. The tile links eligible employees with the OnBase portal to confidentially and securely complete their COI and, if required, FCOI submission.

To participate in the Conflict of Interest survey:

1. Log in to your MySlice account.- *note that for your security, the University does not provide direct links to MySlice.*
2. Select the "Employee Home" tab on the top left of the landing page if not already selected.
3. Scroll down the page of icons/ tiles- **do not** use the search feature.
4. Select the 'Conflict of Interest Survey' tile like the one pictured below at the bottom of the page:



5. Complete the brief questionnaire and submit.
6. If you have any technical issues, please email our team at conflictsofinterest@syr.edu and we will be happy to assist you.

Additional Instructions

A [screen-reader friendly version](#) of the COI survey is available for faculty or staff who use assistive technology such as JAWS, NVDA, or VoiceOver.

Failure to Disclose or Participate

Employees:

All eligible employees are required to participate on an annual basis. 100% participation is required. Eligible employees who fail to participate are placed on unpaid administrative leave until the survey requirements can be fulfilled.

FCOI Eligible Researchers:

Active researchers designated by the Office of Sponsored Programs are required to participate on an annual basis and at the time of proposal submission. 100% participation is required to submit proposals and maintain active researcher status. Eligible employees who fail to participate are placed on unpaid administrative leave until the survey requirements can be fulfilled. Additional parameters related to FCOI are outlined in the Conflict of Interest and Commitment for Principal Investigators and Senior Personnel on Sponsored Programs policy.

For questions or assistance, please contact the:

Conflict of Interest Administrator

Office of Compliance
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