Office of the Vice President for Research

Research Administration Practices (RAP) Sessions

Disclosures in MyCOI-OPA+:
DLCI Overview

Ensuring integrity in research through effective compliance tools

Information provided in this learning session is based on information available as of the date of this presentation

Presented by:
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September 11, 2025

Introductions

Ian Cariolo

Senior Research Administration Education & Support Specialist, VPR

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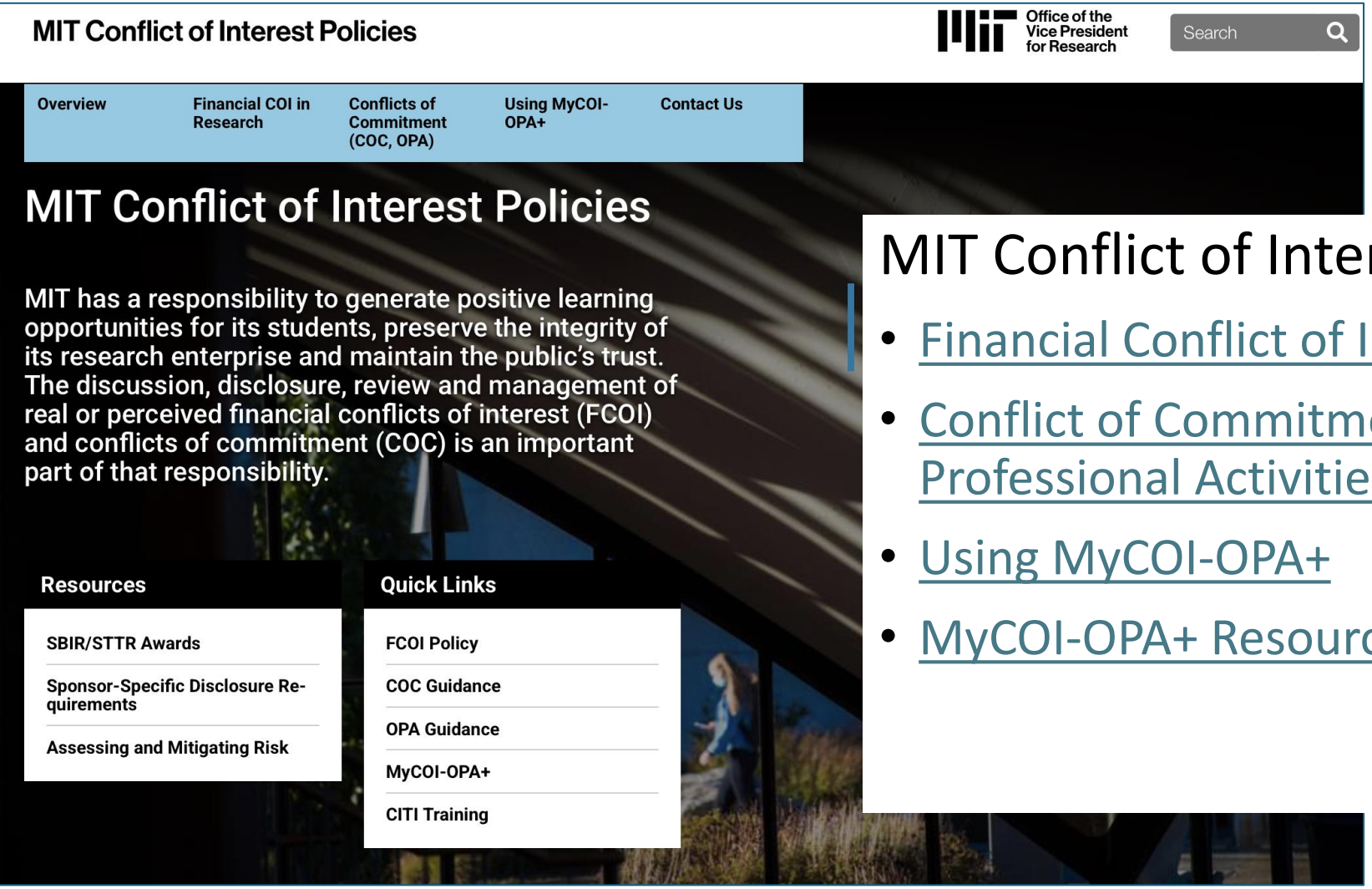
Agenda & Introduction

Agenda

- **MyCOI-OPA+** system for managing Outside Professional Activities (OPA) and Financial Conflicts of Interest (FCOI) disclosures
- My COI (CoeusLite) **Migrating** Active SFI Data
- **Unified** reporting of Engagements and disclosure
- **FCOI Disclosures**: Proposal, Award, Initial/Revision
- **Guidance and Resources**

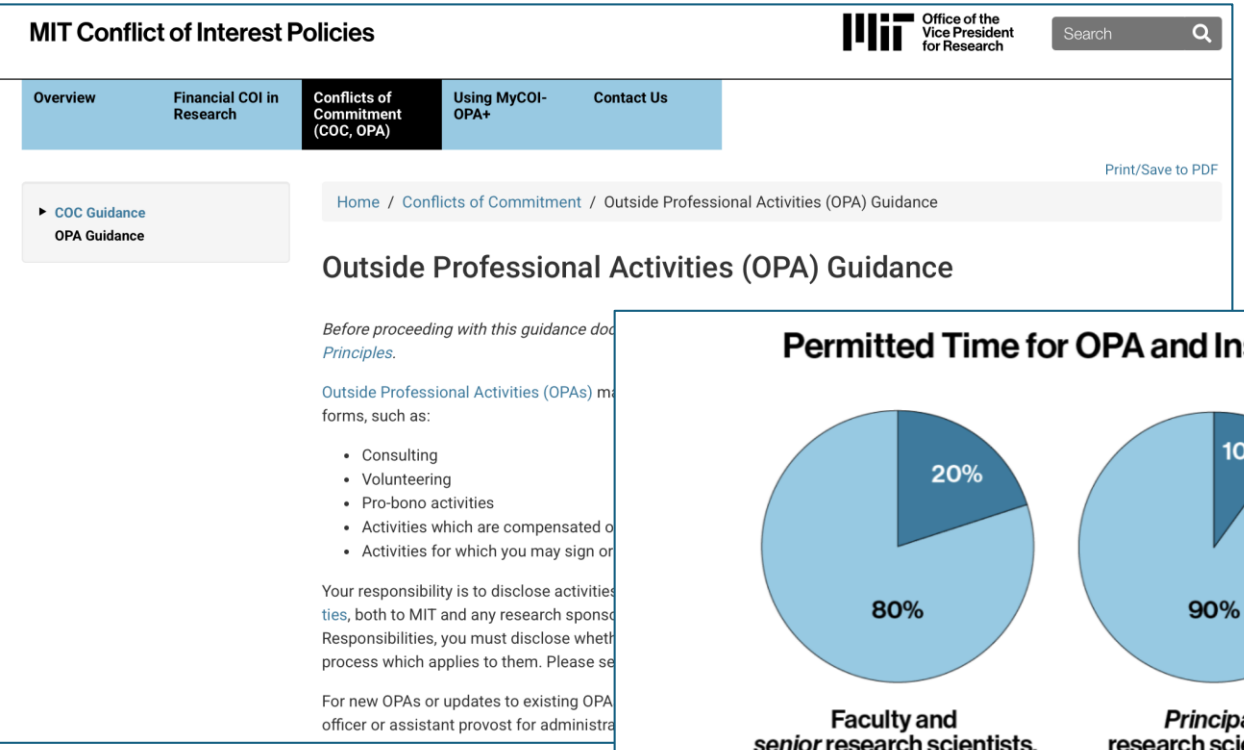
MIT Conflict of Interest Policies

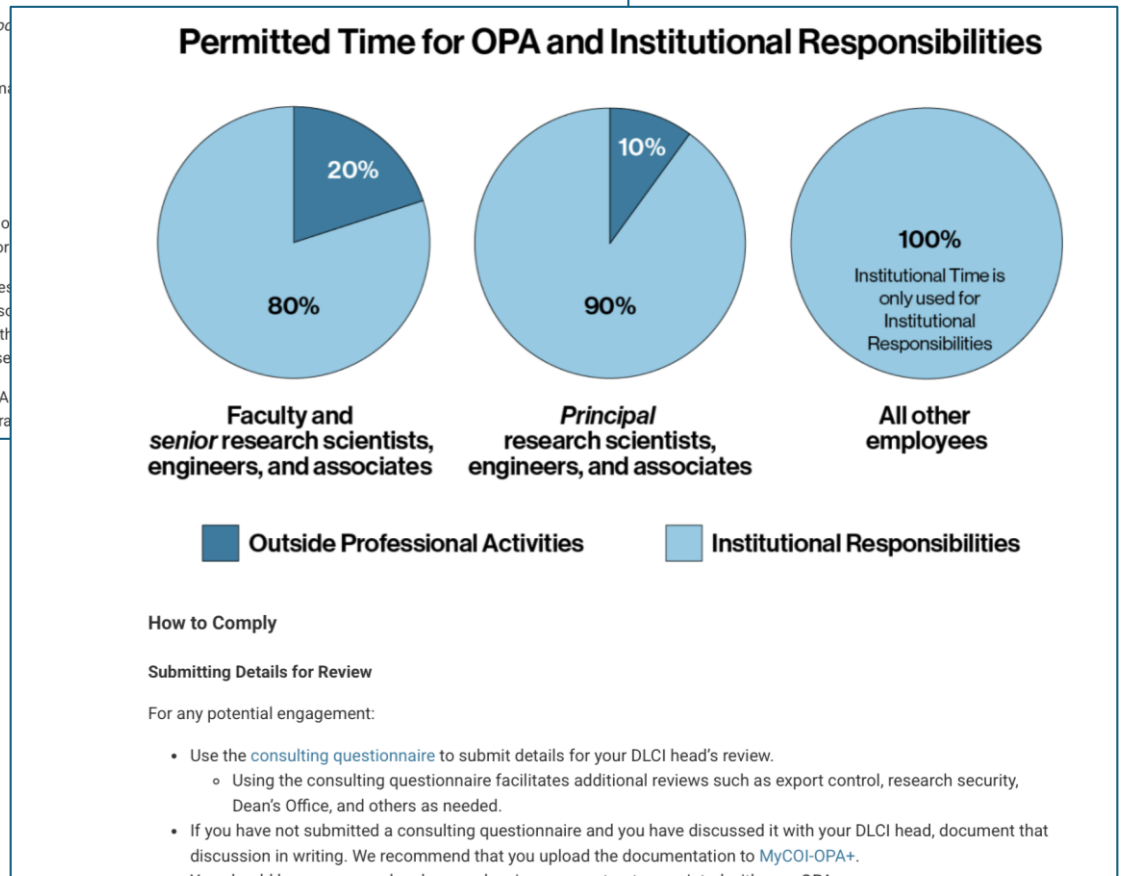


MIT Conflict of Interest Policies (coi.mit.edu/):

- Financial Conflict of Interest in Research (FCOI)
- Conflict of Commitment (COC) and Outside Professional Activities (OPA)
- Using MyCOI-OPA+
- MyCOI-OPA+ Resources

Conflict of Commitment (COC) & Outside Professional Activities (OPA)

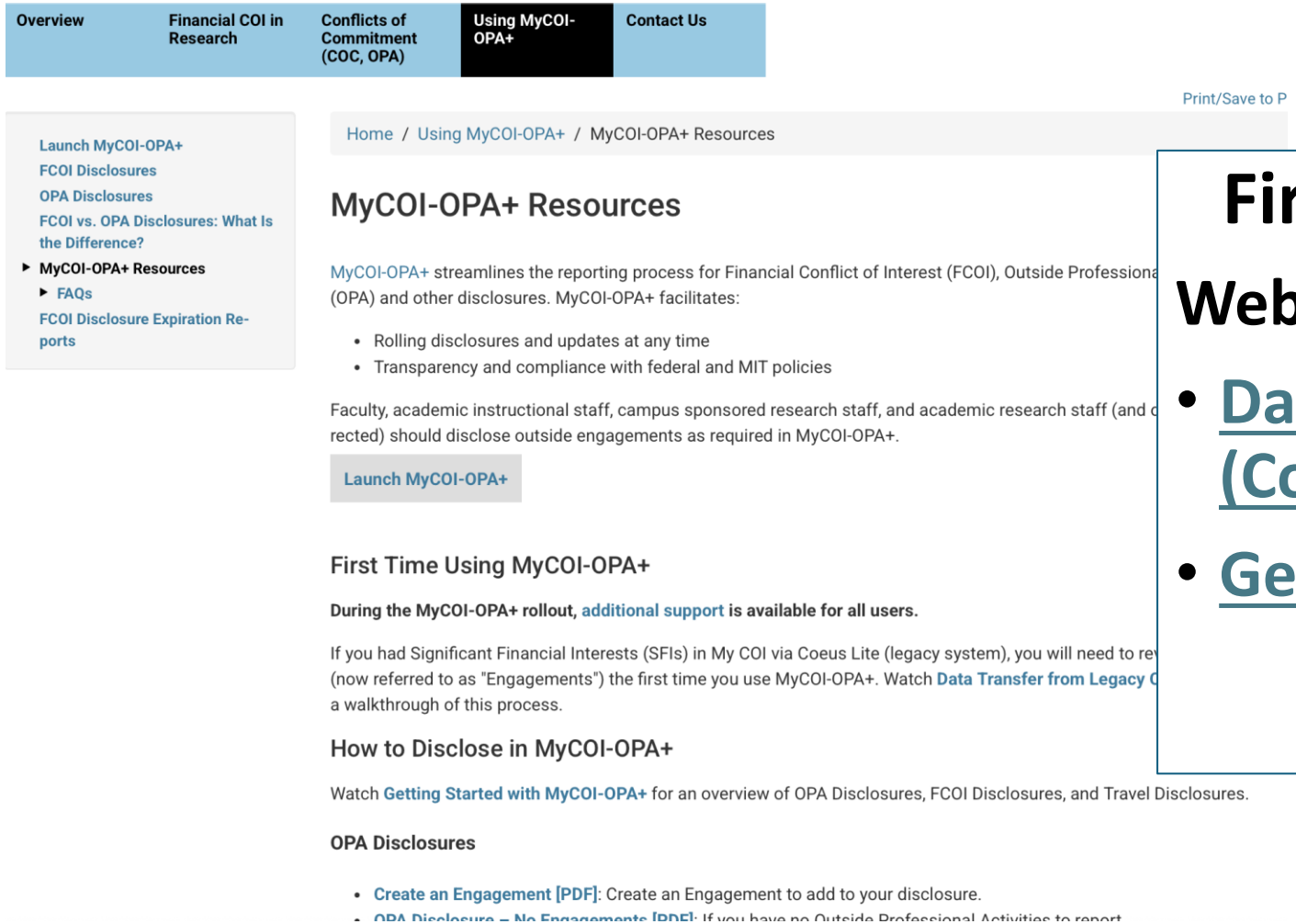




OPA Disclosure:

- Admin staff do not report OPA
- OPA Disclosure not limited to annual report, updated on rolling basis
- Time (days) not included in OPA. Instead, users certify an attestation to abiding by MIT policy

Using MyCOI-OPA+

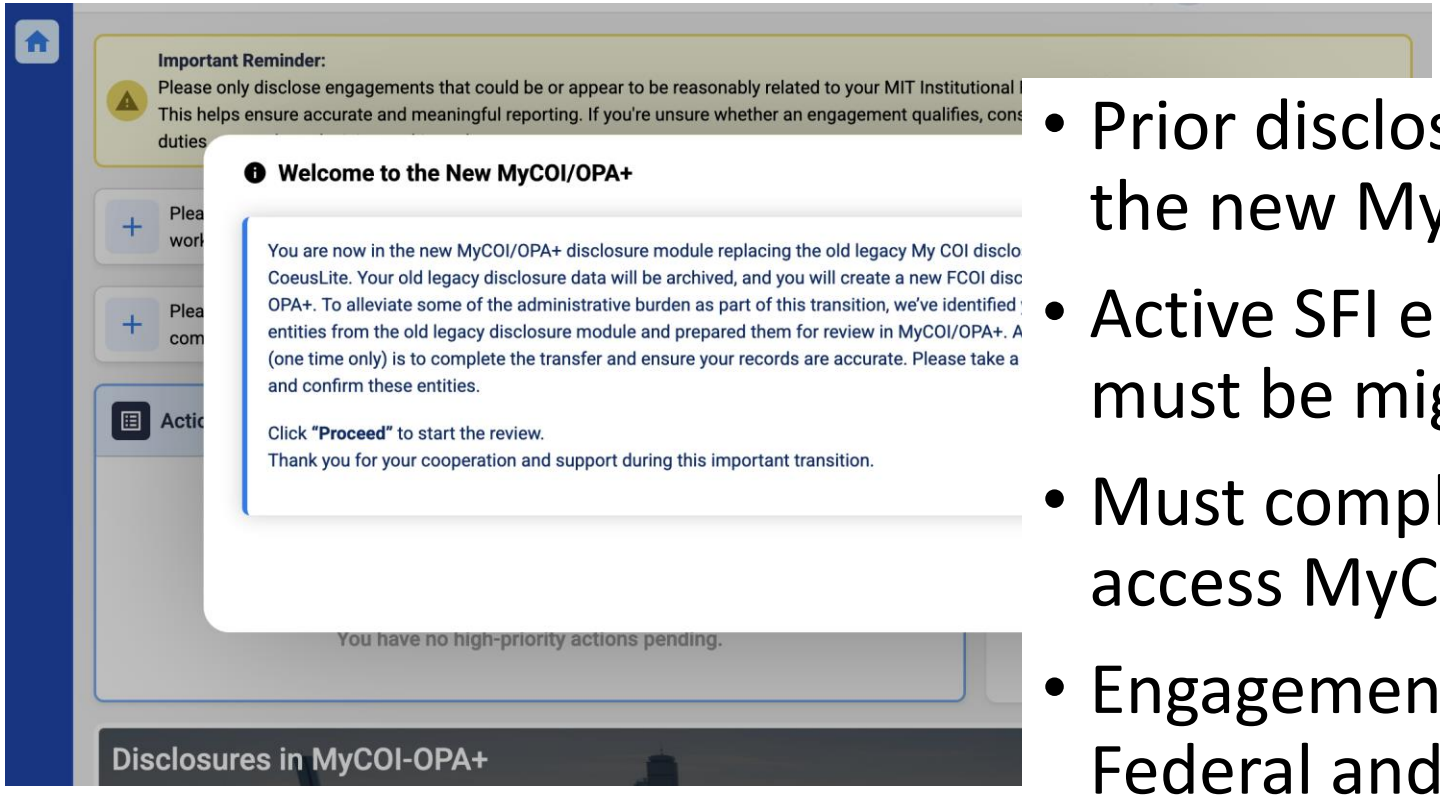


First Time Using MyCOI-OPA+

Web-based learning:

- Data Transfer from Legacy COI (Coeus)
- Getting Started with MyCOI-OPA+

Migrating data: FCOI



- Prior disclosures from FCOI or OPA are not in the new MyCOI-OPA+ system
- Active SFI entities in old legacy COI module must be migrated into MyCOI-OPA+
- Must complete migration before you can access MyCOI-OPA+ system for disclosure
- Engagement/entity details are updated per Federal and Institute policy, so migration requires response to questionnaire

Introducing MyCOI-OPA+

What is MyCOI-OPA+?

Unified Disclosure System

MIT has developed MyCOI-OPA+, a unified disclosure platform, to help MIT faculty, academic and research staff ensure their engagements align with Institute policies, sponsor requirements, and federal regulations.

MyCOI-OPA+ is a single, streamlined platform for disclosing:

- **Financial Conflicts of Interest (FCOI)** — financial interests that could be perceived to affect an individual's research or institutional responsibilities
- **Outside Professional Activities (OPA)** — engagements that may impact an individual's time or obligations to MIT

Engagements MyCOI-OPA+

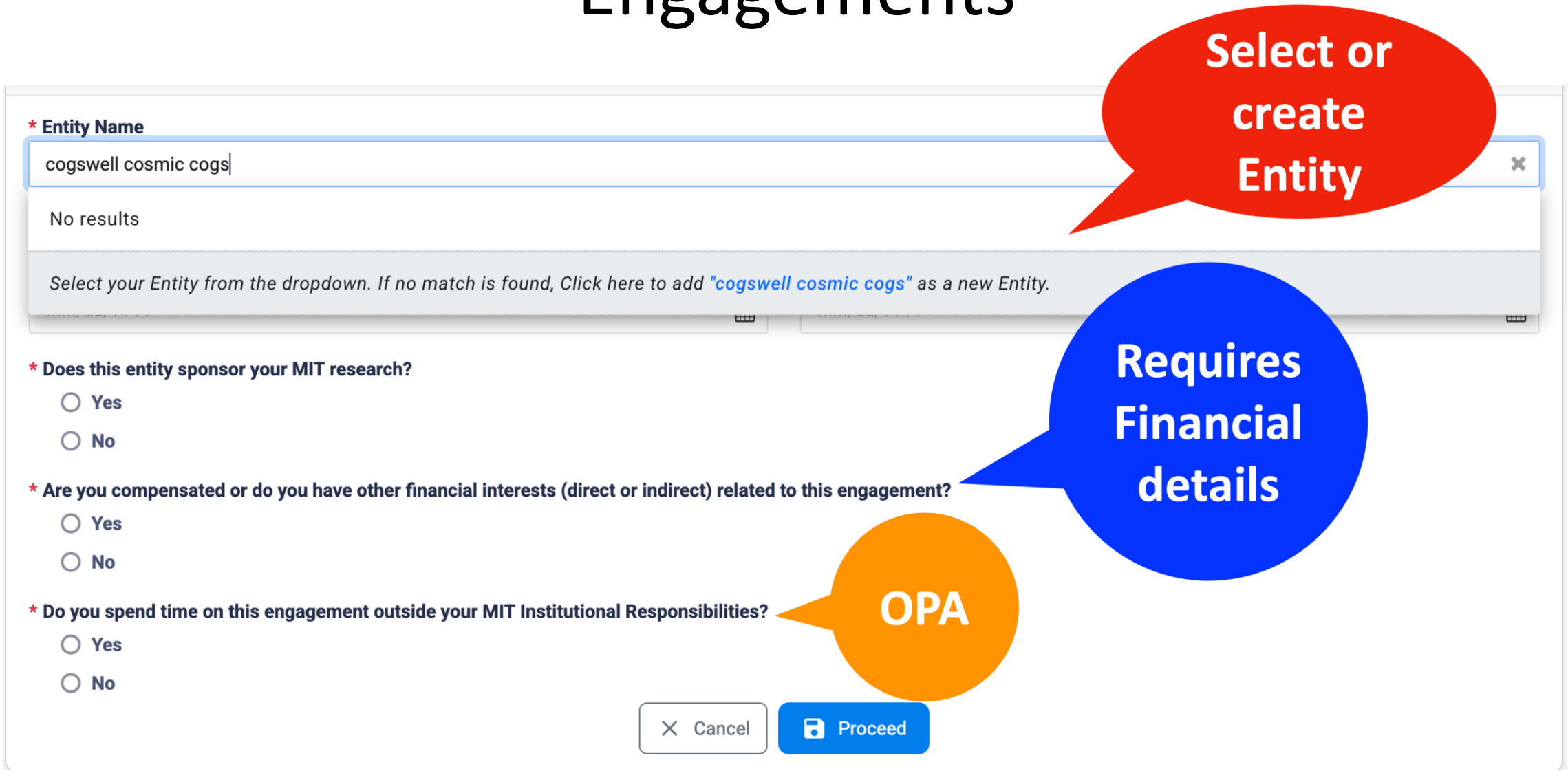
Engagements

At the center of the MyCOI-OPA+ disclosures are a person's **Engagements** that are include information on the Entity or organization with which they have a relationship.

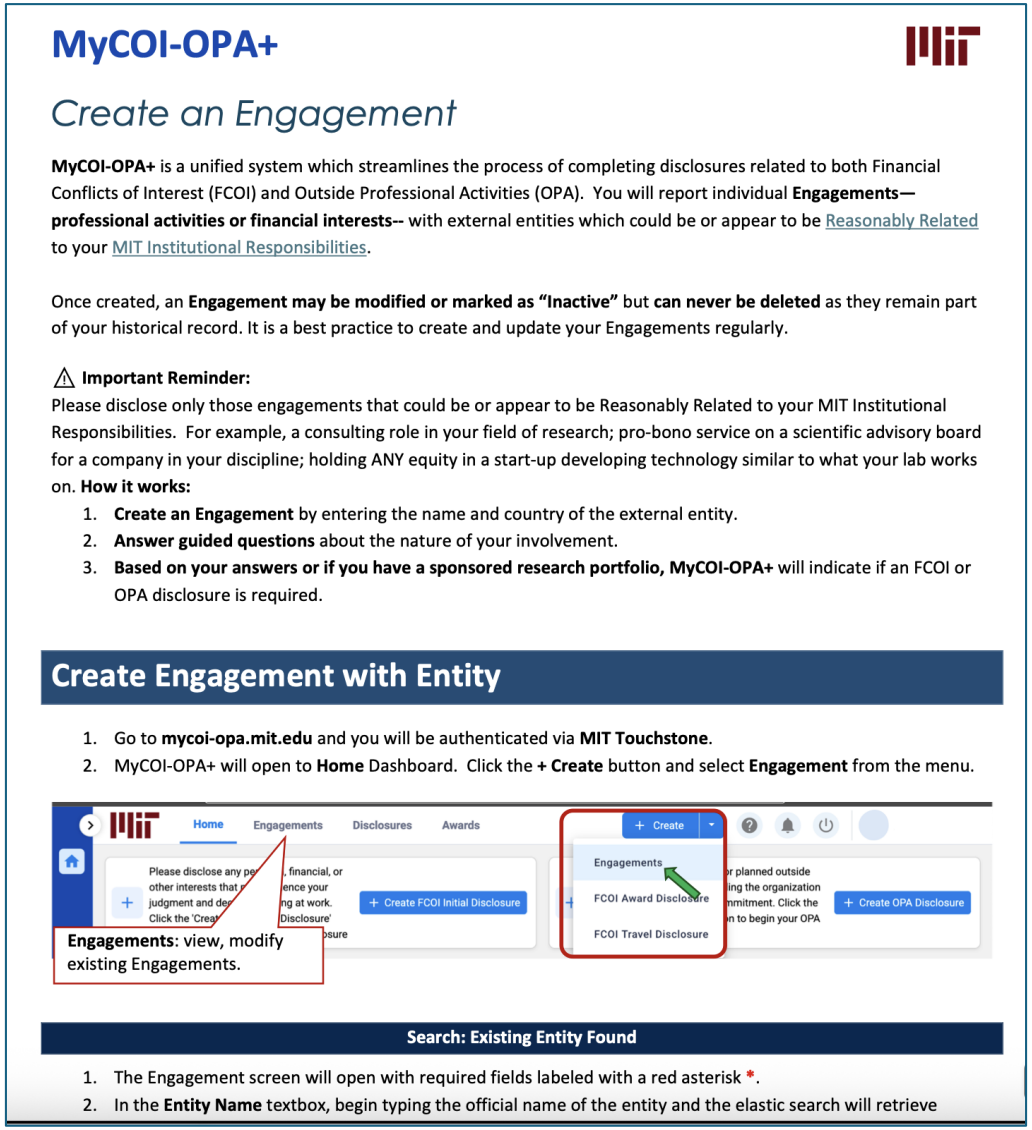
For FCOI disclosures, a user must disclose:

- Within 90 days of acquiring or changing a Significant Financial Interest (SFI)
  - PHS and some other federally sponsored investigators must disclose within 30 days, and include Sponsored Travel in their disclosure
- If 12 months have passed since their last FCOI disclosure

Engagements



Engagements



MyCOI-OPA+

Create an Engagement

MyCOI-OPA+ is a unified system which streamlines the process of completing disclosures related to both Financial Conflicts of Interest (FCOI) and Outside Professional Activities (OPA). You will report individual **Engagements—professional activities or financial interests--** with external entities which could be or appear to be Reasonably Related to your MIT Institutional Responsibilities.

Once created, an **Engagement may be modified or marked as "Inactive"** but **can never be deleted** as they remain part of your historical record. It is a best practice to create and update your Engagements regularly.

⚠ **Important Reminder:**
Please disclose only those engagements that could be or appear to be Reasonably Related to your MIT Institutional Responsibilities. For example, a consulting role in your field of research; pro-bono service on a scientific advisory board for a company in your discipline; holding ANY equity in a start-up developing technology similar to what your lab works on. **How it works:**

1. **Create an Engagement** by entering the name and country of the external entity.
2. **Answer guided questions** about the nature of your involvement.
3. **Based on your answers or if you have a sponsored research portfolio, MyCOI-OPA+** will indicate if an FCOI or OPA disclosure is required.

Create Engagement with Entity

1. Go to **mycoi-opa.mit.edu** and you will be authenticated via **MIT Touchstone**.
2. MyCOI-OPA+ will open to **Home** Dashboard. Click the **+ Create** button and select **Engagement** from the menu.

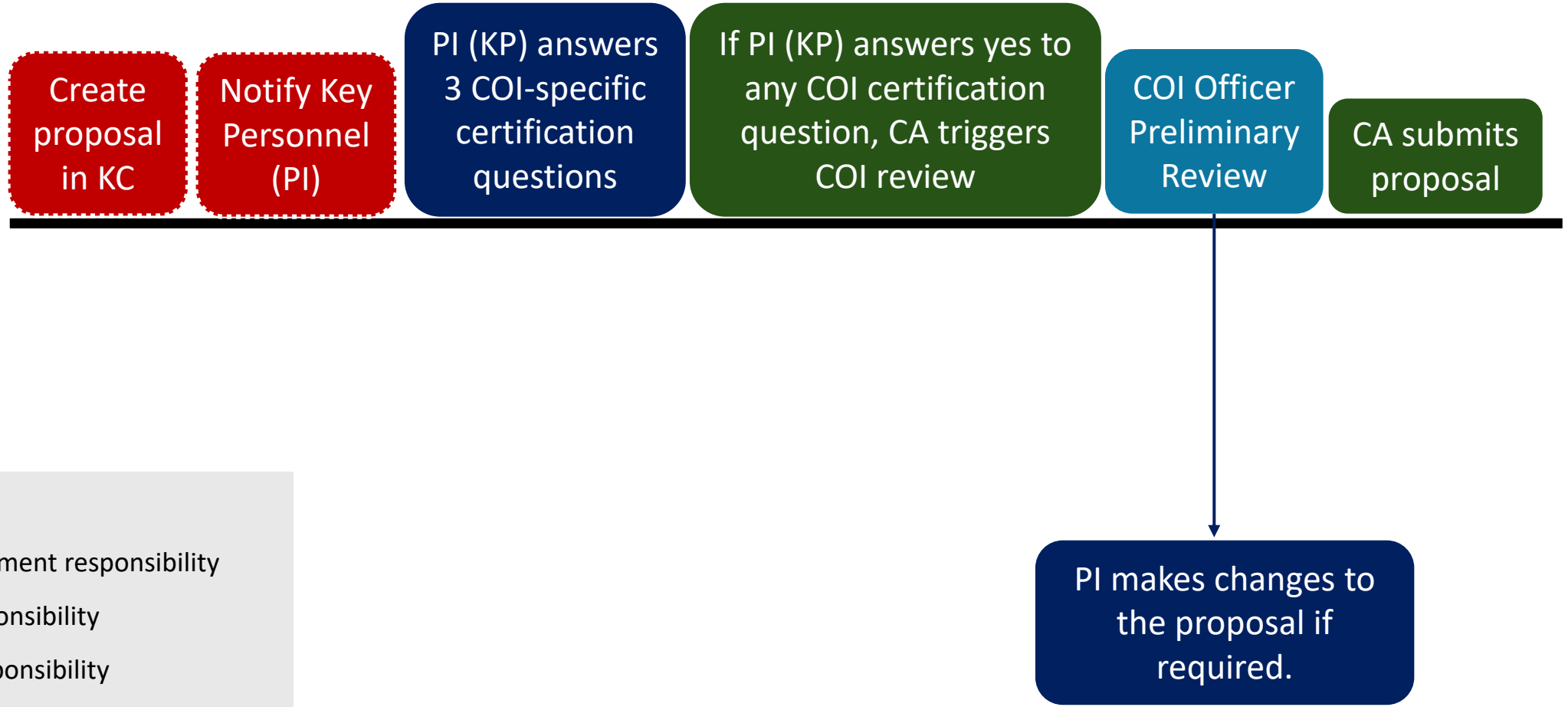
Search: Existing Entity Found

1. The Engagement screen will open with required fields labeled with a red asterisk *.
2. In the **Entity Name** textbox, begin typing the official name of the entity and the elastic search will retrieve

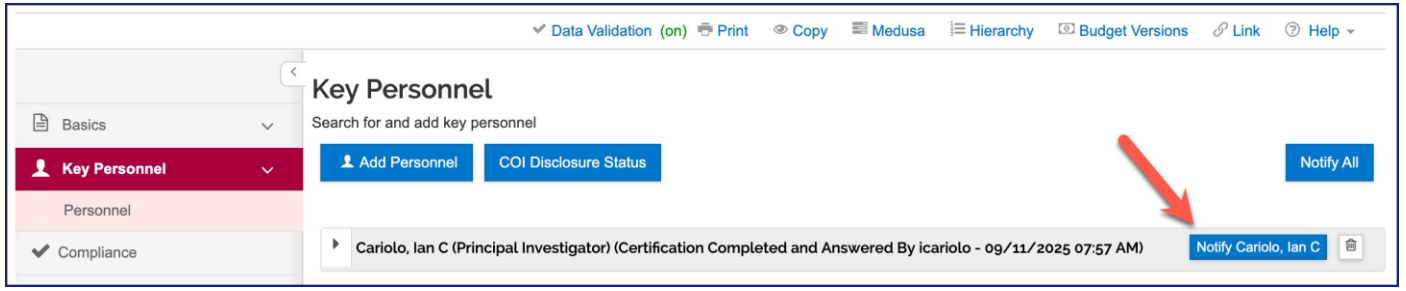
- See **Create an Engagement [PDF]**: for details for reporter
- Engagements must be created and updated on a rolling basis based on Federal and Institute requirments

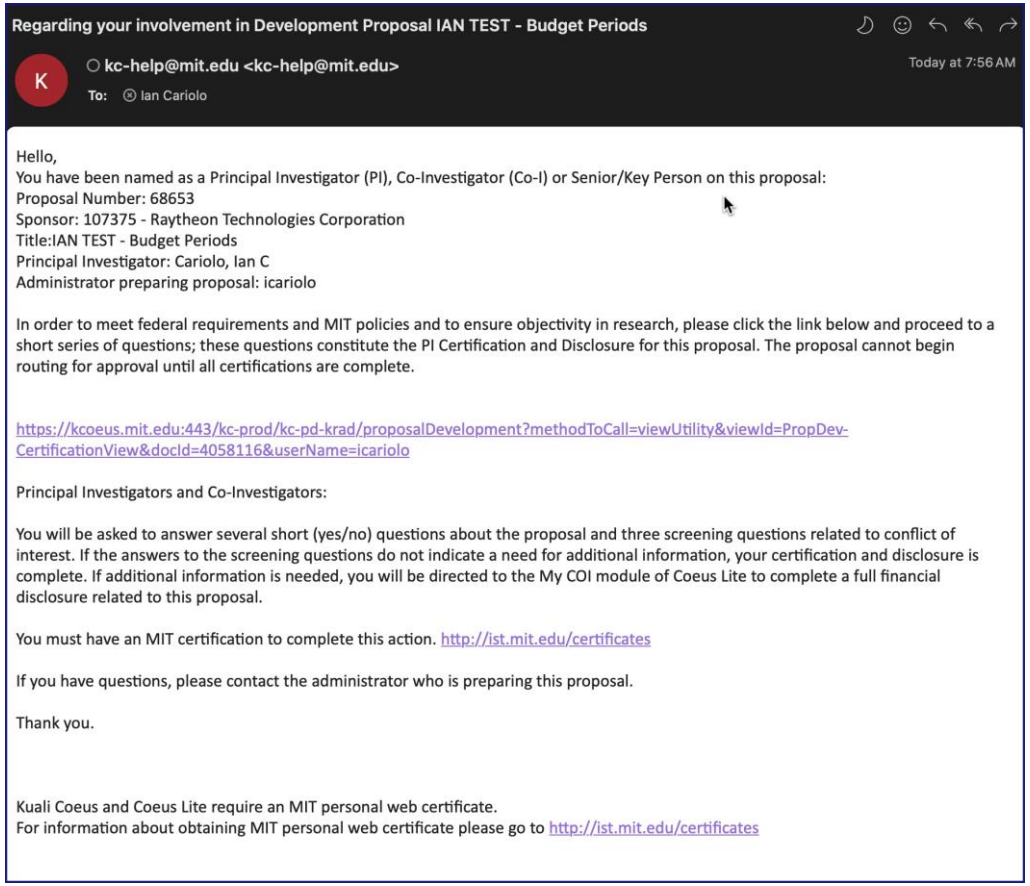
FCOI Disclosure Proposal

Proposal Stage



Proposal Certification Notification

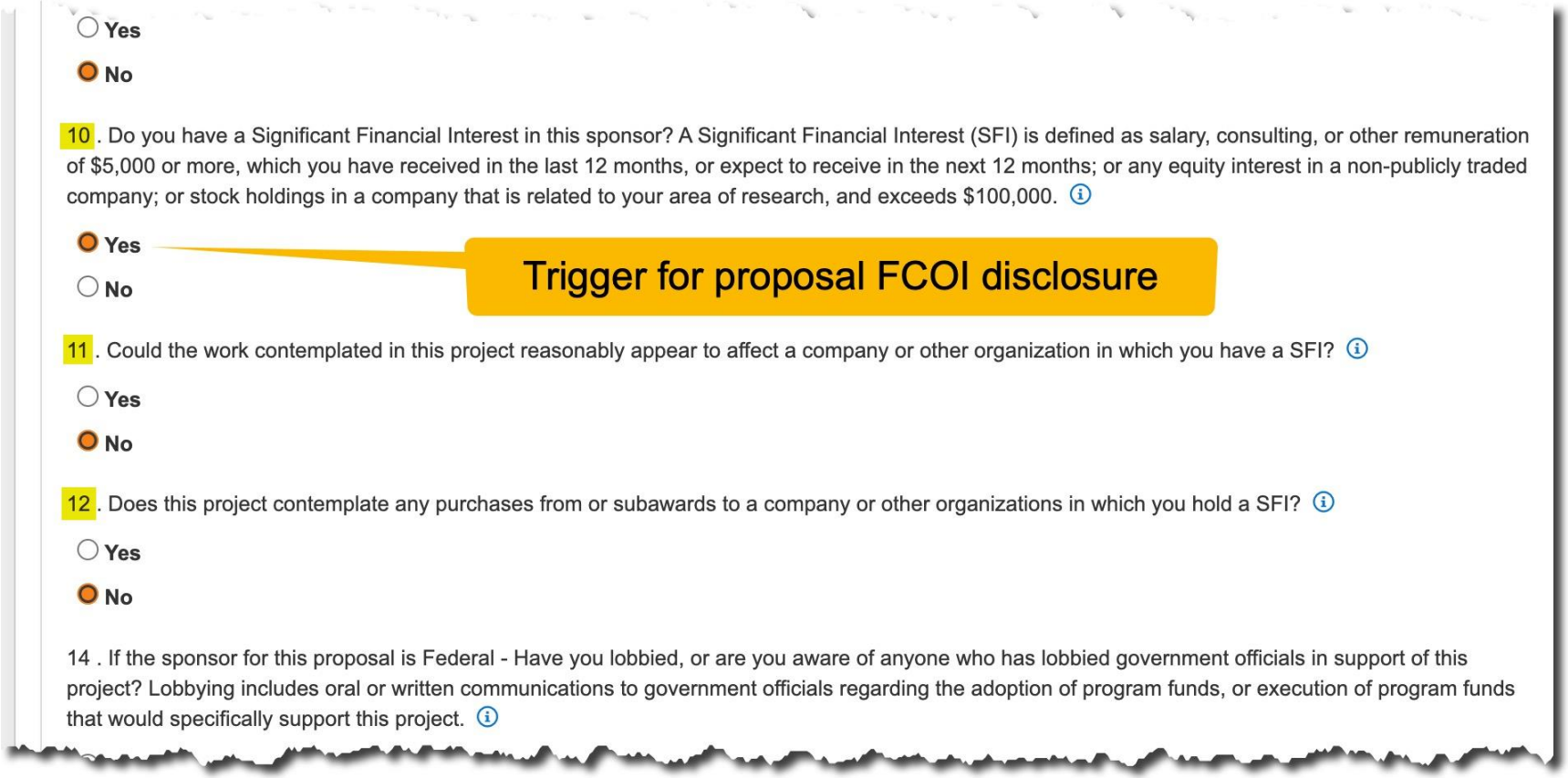




Proposal Certification

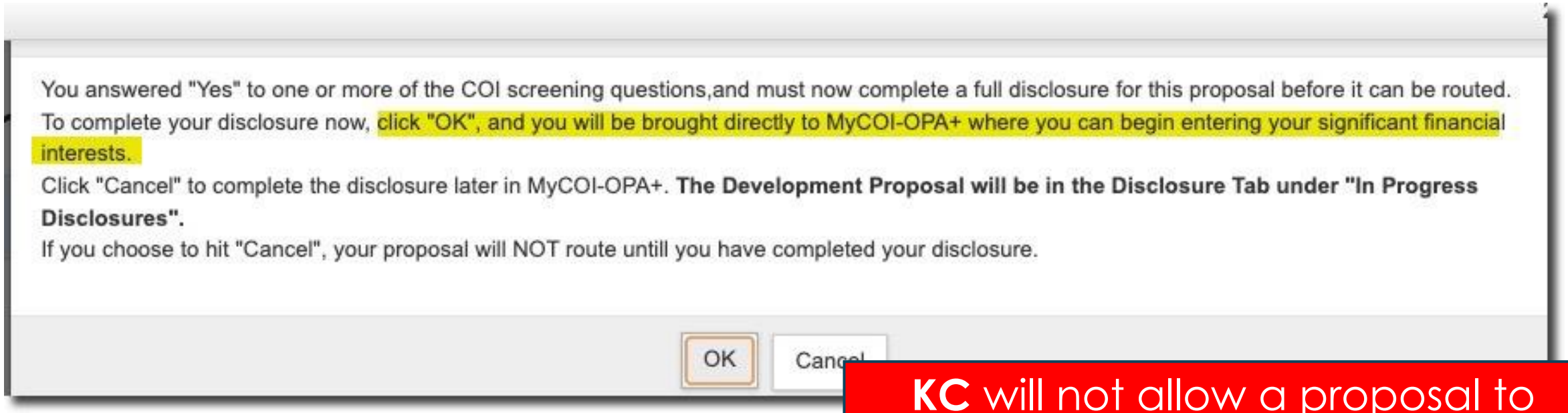
REMEMBER: Proposal Certification is not COI, and COI is not proposal certification.

Only when answering YES to either 10, 11, or 12 (the SFI screening questions in the certification) does there become an FCOI implication at proposal phase.



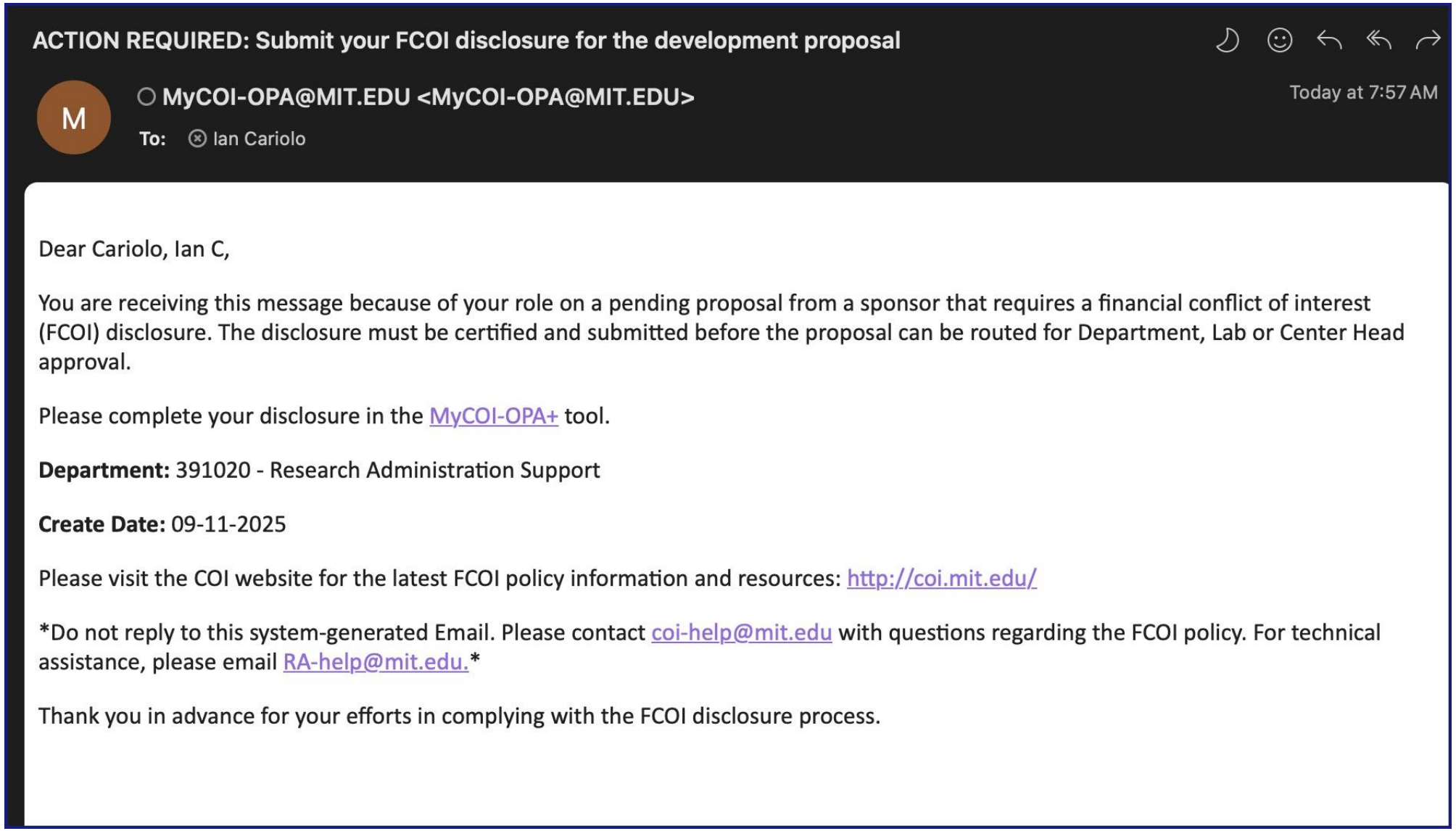
Proposal Disclosure

Investigators and Key Personnel complete KC proposal certification including COI screening in Kuali Coeus (KC), triggering disclosures if potential conflict are indicated.



KC will not allow a proposal to route for internal approval until all COI certification and disclosure requirements are met.

Proposal FCOI Disclosure



ACTION REQUIRED: Submit your FCOI disclosure for the development proposal

M

MyCOI-OPA@MIT.EDU <MyCOI-OPA@MIT.EDU>

Today at 7:57 AM

To: Ian Cariolo

Dear Cariolo, Ian C,

You are receiving this message because of your role on a pending proposal from a sponsor that requires a financial conflict of interest (FCOI) disclosure. The disclosure must be certified and submitted before the proposal can be routed for Department, Lab or Center Head approval.

Please complete your disclosure in the MyCOI-OPA+ tool.

Department: 391020 - Research Administration Support

Create Date: 09-11-2025

Please visit the COI website for the latest FCOI policy information and resources: http://coi.mit.edu/

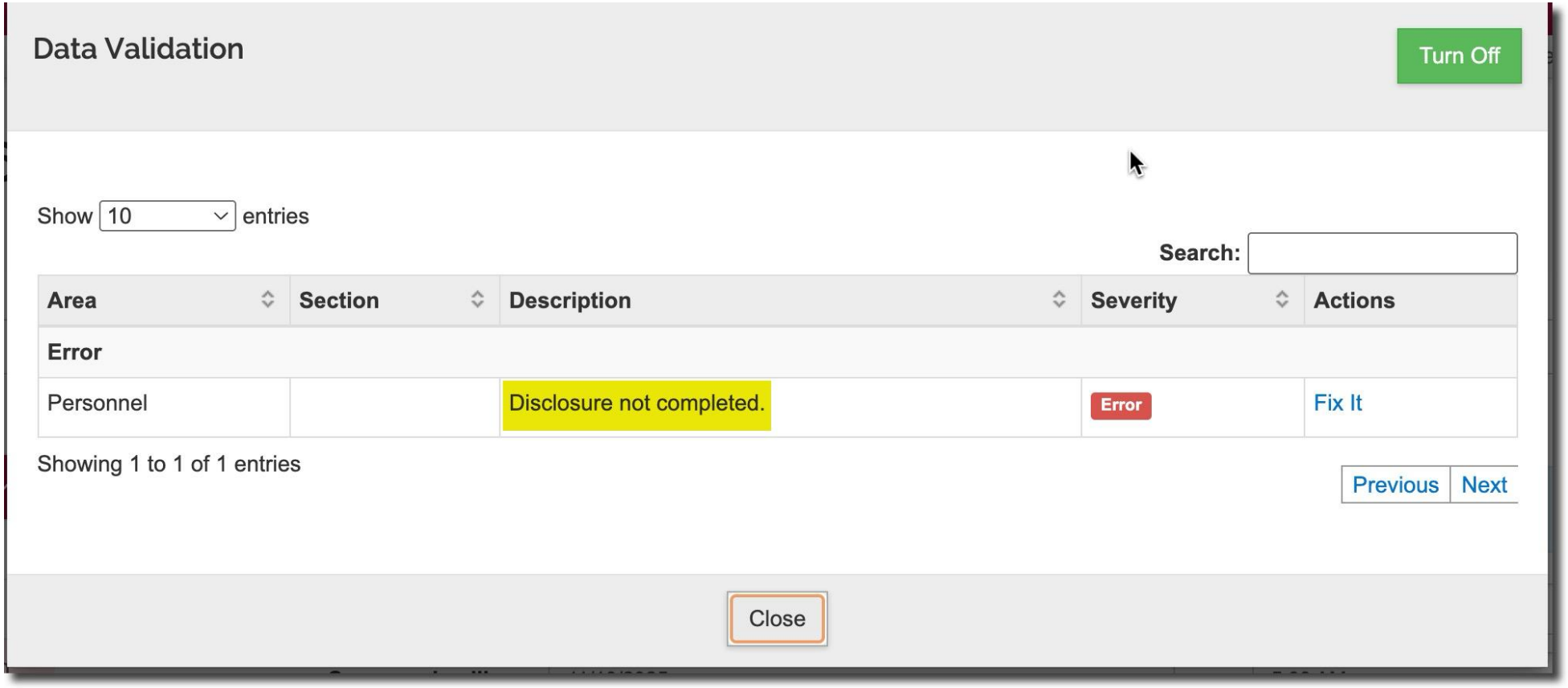
Do not reply to this system-generated Email. Please contact coi-help@mit.edu with questions regarding the FCOI policy. For technical assistance, please email RA-help@mit.edu.

Thank you in advance for your efforts in complying with the FCOI disclosure process.

Validation

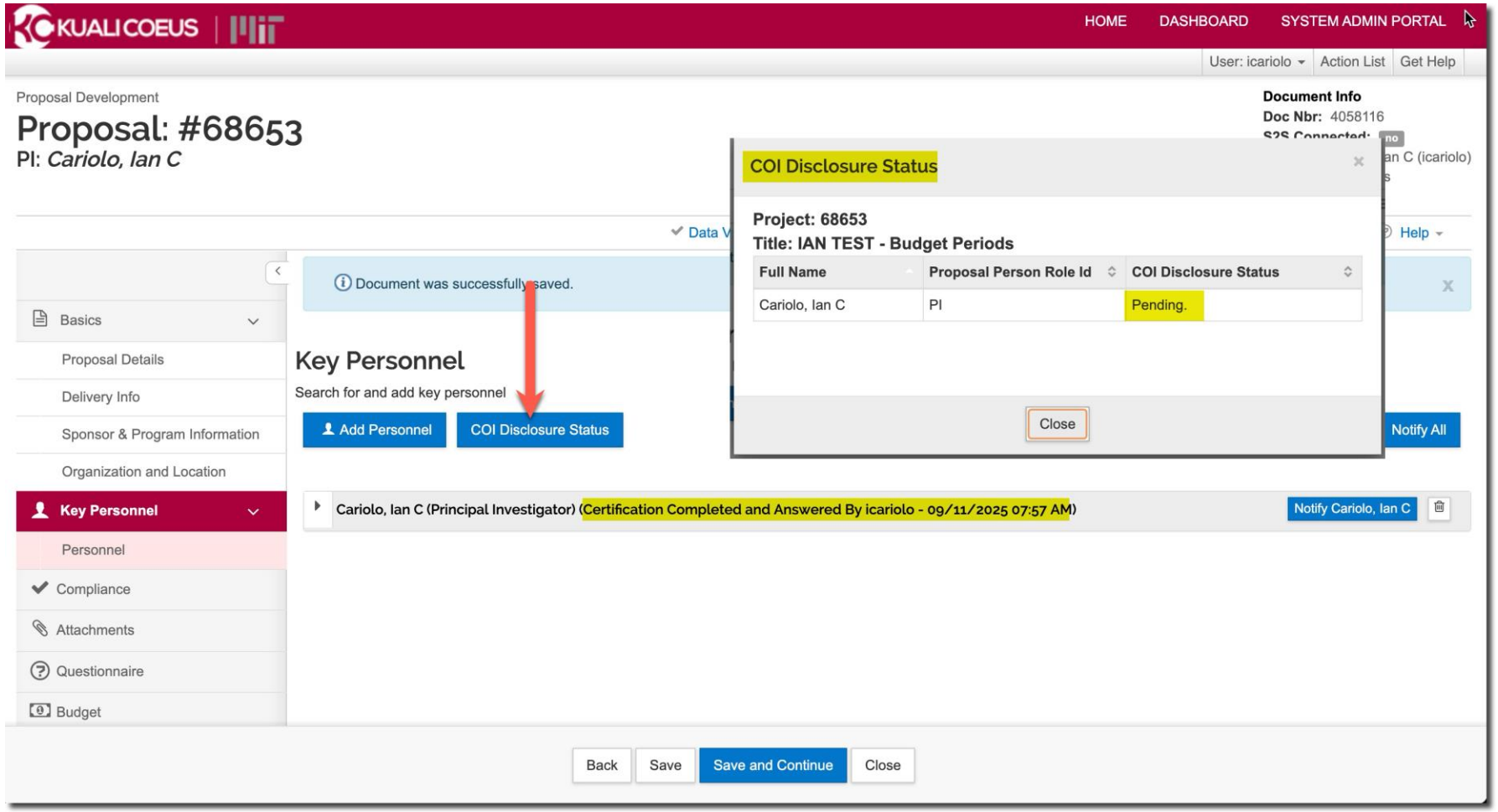
Q: *If I've received an email from KC that all certifications are complete, why is the KC proposal validation telling me that the Disclosure is not completed?*

A: *The email you receive from KC is only attesting to the certification questions having all been answered. The act of completing a proposal COI disclosure is a separate action outside of KC.*

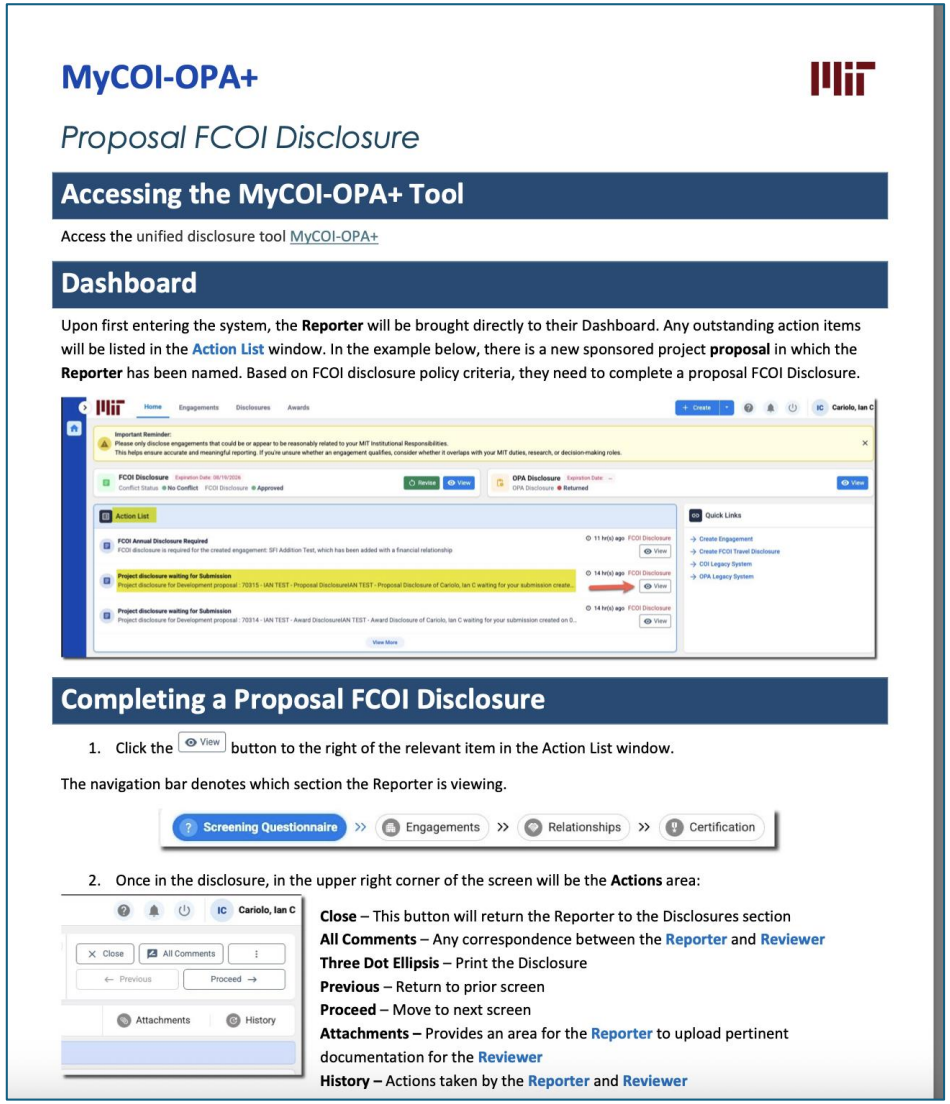


Proposal Certification vs. Proposal Disclosure

To determine if the Key Personnel have completed a disclosure, one can check within the proposal via the COI Disclosure Status button:



Proposal Disclosure Overview



MyCOI-OPA+

Proposal FCOI Disclosure

Accessing the MyCOI-OPA+ Tool

Access the unified disclosure tool MyCOI-OPA+

Dashboard

Upon first entering the system, the **Reporter** will be brought directly to their Dashboard. Any outstanding action items will be listed in the **Action List** window. In the example below, there is a new sponsored project **proposal** in which the **Reporter** has been named. Based on FCOI disclosure policy criteria, they need to complete a proposal FCOI Disclosure.

Completing a Proposal FCOI Disclosure

1. Click the View button to the right of the relevant item in the Action List window.

The navigation bar denotes which section the Reporter is viewing.

2. Once in the disclosure, in the upper right corner of the screen will be the **Actions** area:

Close – This button will return the Reporter to the Disclosures section
All Comments – Any correspondence between the **Reporter** and **Reviewer**
Three Dot Ellipsis – Print the Disclosure
Previous – Return to prior screen
Proceed – Move to next screen
Attachments – Provides an area for the **Reporter** to upload pertinent documentation for the **Reviewer**
History – Actions taken by the **Reporter** and **Reviewer**

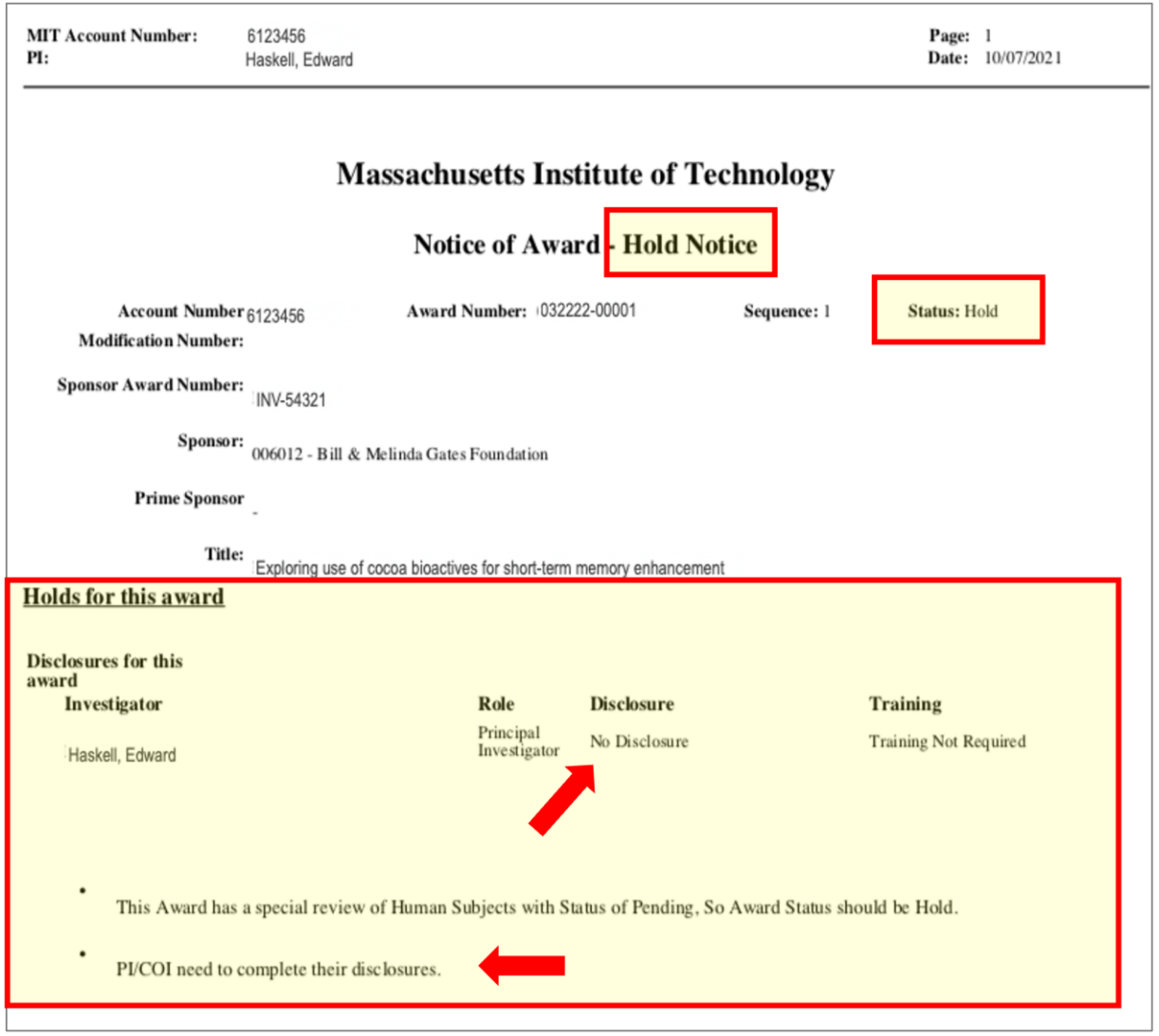
- See **Proposal FCOI Disclosure [PDF]** for details for reporter
- If you have questions about a specific proposal, contact your DLCI RAS Contract Administrator

FCOI Disclosure Award

Award Setup

New Award is set up in ***Hold*** while reviewed for compliance, including FCOI disclosure or CITI COI training (if required by sponsor).

PI/Co-I/Key Personnel are contacted with instructions for completing FCOI disclosure in MyCOI-OPA+ and CITI training requirements.



MIT Account Number: 6123456
PI: Haskell, Edward
Page: 1
Date: 10/07/2021

Massachusetts Institute of Technology

Notice of Award - Hold Notice

Account Number 6123456 Award Number: 032222-00001 Sequence: 1 Status: Hold
Modification Number:

Sponsor Award Number: INV-54321

Sponsor: 006012 - Bill & Melinda Gates Foundation

Prime Sponsor -

Title: Exploring use of cocoa bioactives for short-term memory enhancement

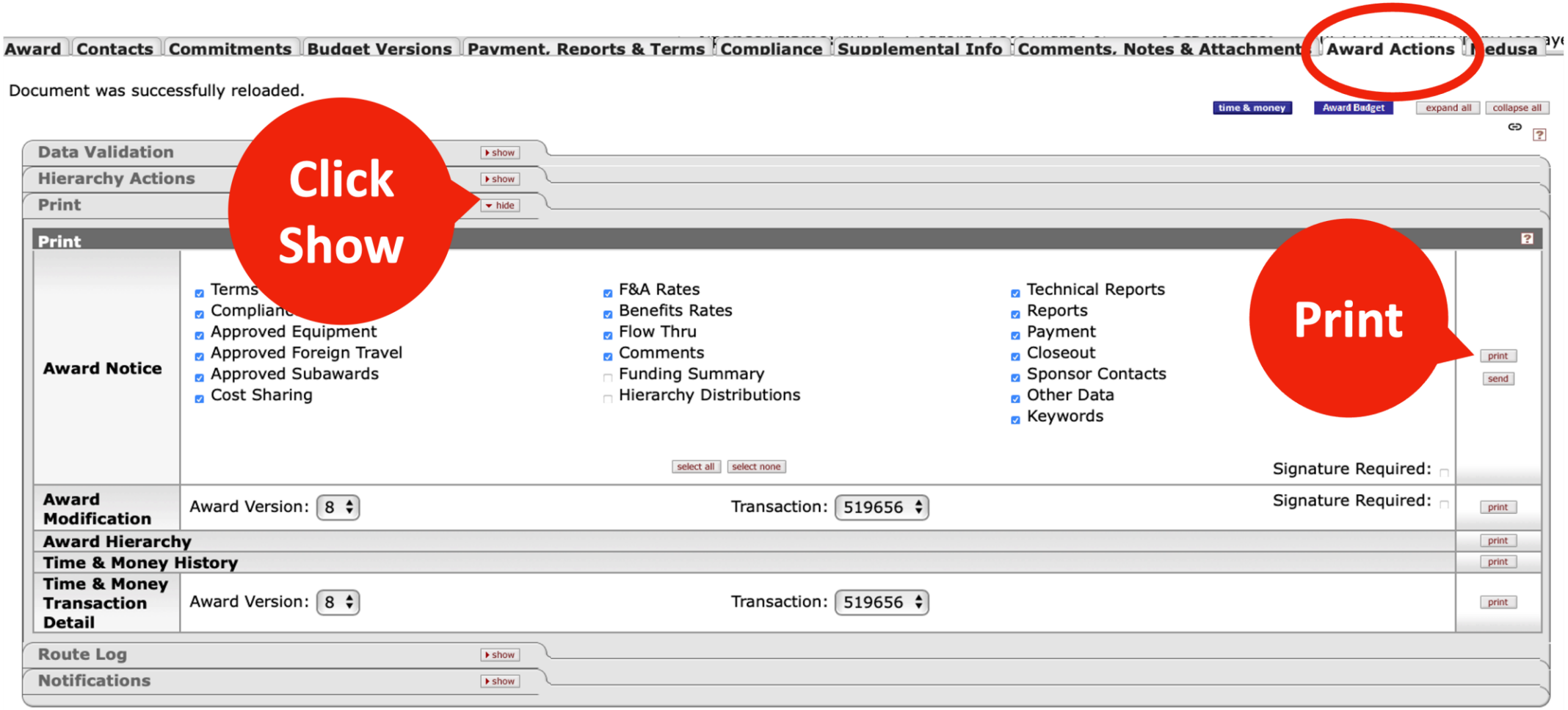
Holds for this award

Disclosures for this award

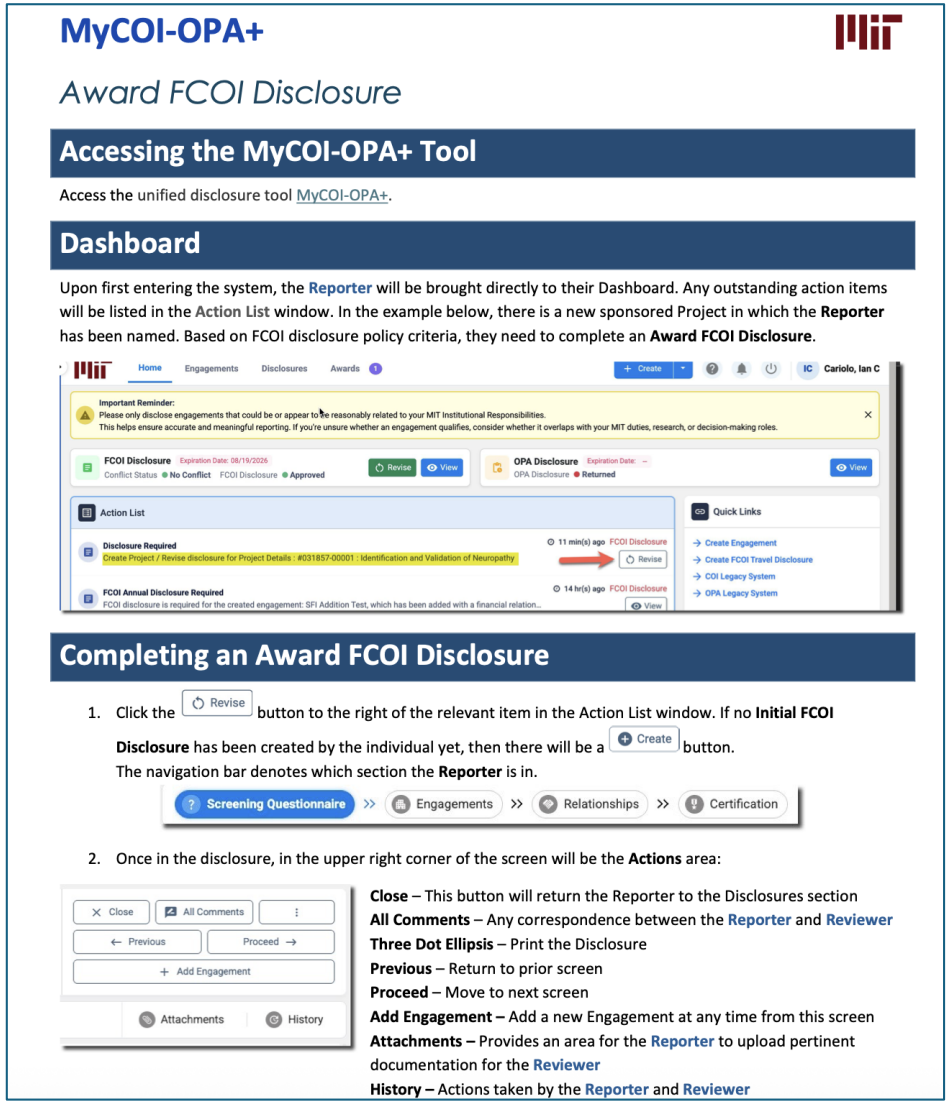
Investigator	Role	Disclosure	Training
Haskell, Edward	Principal Investigator	No Disclosure	Training Not Required

- This Award has a special review of Human Subjects with Status of Pending, So Award Status should be Hold.
- PI/COI need to complete their disclosures.

Printing the Notice of Award from KC



Award Disclosure Overview



MyCOI-OPA+

Award FCOI Disclosure

Accessing the MyCOI-OPA+ Tool

Access the unified disclosure tool MyCOI-OPA+.

Dashboard

Upon first entering the system, the **Reporter** will be brought directly to their Dashboard. Any outstanding action items will be listed in the **Action List** window. In the example below, there is a new sponsored Project in which the **Reporter** has been named. Based on FCOI disclosure policy criteria, they need to complete an **Award FCOI Disclosure**.

Completing an Award FCOI Disclosure

1. Click the Revise button to the right of the relevant item in the Action List window. If no **Initial FCOI Disclosure** has been created by the individual yet, then there will be a Create button.
   The navigation bar denotes which section the **Reporter** is in.

2. Once in the disclosure, in the upper right corner of the screen will be the **Actions** area:

Close – This button will return the Reporter to the Disclosures section
All Comments – Any correspondence between the **Reporter** and **Reviewer**
Three Dot Ellipsis – Print the Disclosure
Previous – Return to prior screen
Proceed – Move to next screen
Add Engagement – Add a new Engagement at any time from this screen
Attachments – Provides an area for the **Reporter** to upload pertinent documentation for the **Reviewer**
History – Actions taken by the **Reporter** and **Reviewer**

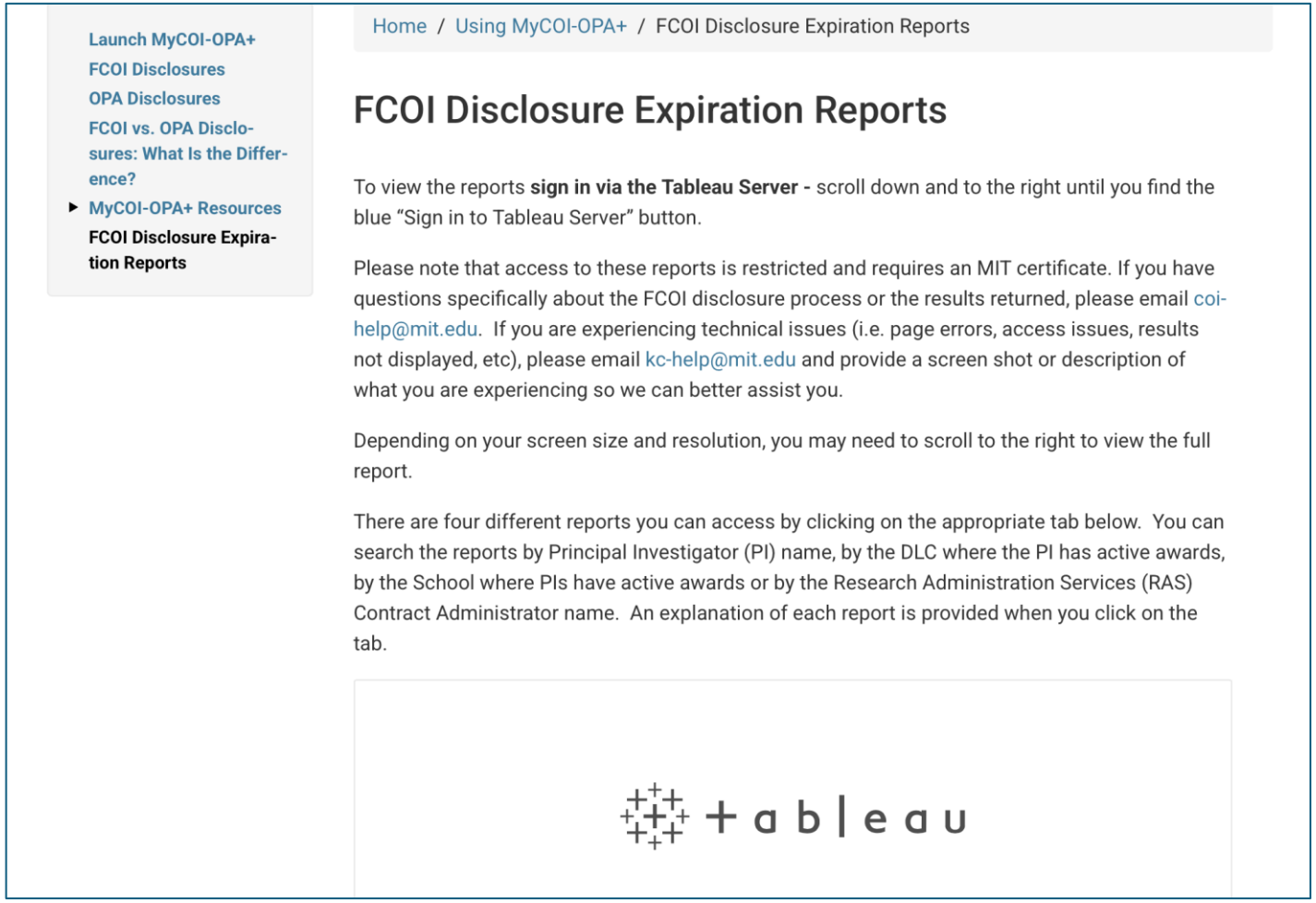
- See **Award FCOI Disclosure [PDF]** for details for reporter
- If you have questions about a specific award, contact your DLCI RAS Contract Administrator

FCOI Disclosure Initial/Revision

FCOI Initial/Revision Disclosure

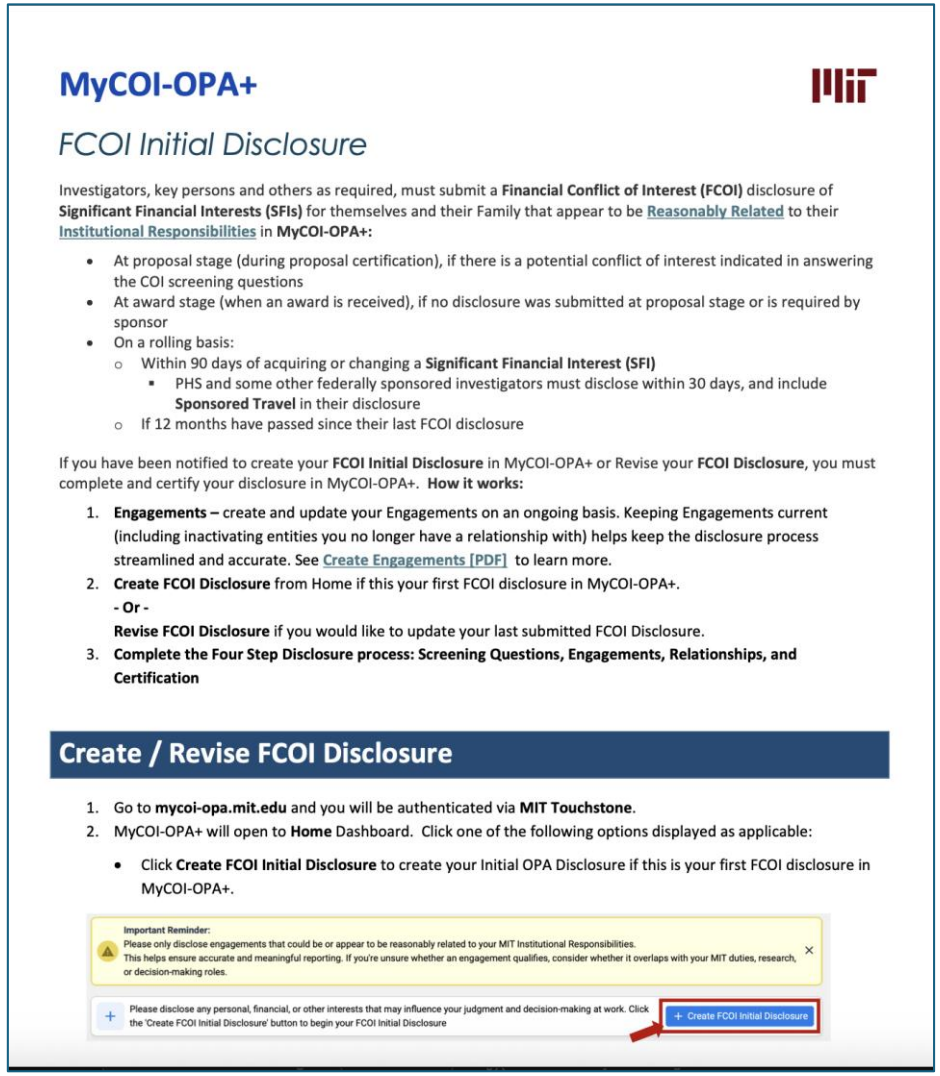
- Prior FCOI disclosures in old My COI (CoeusLite) module are not copied into MyCOI-OPA+ but remain archived in legacy system and part of a person's historical record.
- First FCOI Disclosure in MyCOI-OPA+ is the **Initial FCOI Disclosure**. Subsequent submissions are Revision FCOI Disclose.
- **Still 4 Step Process**:
  - Screening Questions
  - Engagements
  - Relationship of SFI to Project
  - Certification

Expiring FCOI Disclosures



- See FCOI Disclosure Expiration Reports
- PI/Co-I/KPs are notified of expiring disclosures

FCOI Disclosure Overview



MyCOI-OPA+

FCOI Initial Disclosure

Investigators, key persons and others as required, must submit a **Financial Conflict of Interest (FCOI)** disclosure of **Significant Financial Interests (SFIs)** for themselves and their Family that appear to be Reasonably Related to their Institutional Responsibilities in **MyCOI-OPA+:**

- At proposal stage (during proposal certification), if there is a potential conflict of interest indicated in answering the COI screening questions
- At award stage (when an award is received), if no disclosure was submitted at proposal stage or is required by sponsor
- On a rolling basis:
  - Within 90 days of acquiring or changing a **Significant Financial Interest (SFI)**
    - PHS and some other federally sponsored investigators must disclose within 30 days, and include **Sponsored Travel** in their disclosure
  - If 12 months have passed since their last FCOI disclosure

If you have been notified to create your **FCOI Initial Disclosure** in MyCOI-OPA+ or Revise your **FCOI Disclosure**, you must complete and certify your disclosure in MyCOI-OPA+. **How it works:**

1. **Engagements –** create and update your Engagements on an ongoing basis. Keeping Engagements current (including inactivating entities you no longer have a relationship with) helps keep the disclosure process streamlined and accurate. See Create Engagements [PDF] to learn more.
2. **Create FCOI Disclosure** from Home if this your first FCOI disclosure in MyCOI-OPA+.
   - Or -
   Revise FCOI Disclosure if you would like to update your last submitted FCOI Disclosure.
3. **Complete the Four Step Disclosure process: Screening Questions, Engagements, Relationships, and Certification**

Create / Revise FCOI Disclosure

1. Go to **mycoi-opa.mit.edu** and you will be authenticated via **MIT Touchstone**.
2. MyCOI-OPA+ will open to **Home** Dashboard. Click one of the following options displayed as applicable:
   - Click **Create FCOI Initial Disclosure** to create your Initial OPA Disclosure if this is your first FCOI disclosure in MyCOI-OPA+.

Important Reminder:
Please only disclose engagements that could be or appear to be reasonably related to your MIT Institutional Responsibilities.
This helps ensure accurate and meaningful reporting. If you're unsure whether an engagement qualifies, consider whether it overlaps with your MIT duties, research, or decision-making roles.

Please disclose any personal, financial, or other interests that may influence your judgment and decision-making at work. Click the 'Create FCOI Initial Disclosure' button to begin your FCOI Initial Disclosure

+ Create FCOI Initial Disclosure

- See **FCOI Initial Disclosure [PDF]** for details for reporter

Resources

MyCOI-OPA+ Resources for Reporters

Quick Reference Cards

OPA Disclosures

- Create an Engagement [PDF]: Create an Engagement to add to your disclosure.
- OPA Disclosure – No Engagements [PDF]: If you have no Outside Professional Activities to report.
- OPA Disclosure – With Engagements [PDF]: If you have at least one Outside Professional Activity to report.

FCOI Disclosures

- Create an Engagement [PDF]: Create an Engagement to add to your disclosure.
- Proposal FCOI Disclosure [PDF]: If you indicate a potential conflict during proposal certification.
- Award FCOI Disclosure [PDF]: If you need to submit an FCOI disclosure due to an award hold notice.
- FCOI Initial Disclosure [PDF]**:** If you need to create or revise your FCOI disclosure.

Resources for Research Administrators

Key Contact Support and Assistance

- **Policy questions**: Contact coi-help@mit.edu
- **System and process questions:** Contact ra-help@mit.edu
- **Browse FAQs**
- **DLCI RAS Contract Administrator:** see DLCI RAS Directory

Access to Guidance Documents

Administrators can utilize guides on **MyCOI-OPA+ Resources**.

Q&A and Wrap-Up