

RUSH's Annual COI Survey Instructions

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Reminder: RUSH's annual Conflict of Interest (COI) Survey is distributed each year in July after the fiscal year has ended. *Those designated to fill out a Conflict of Interest (COI) survey will receive a personalized link to submit a disclosure.* **NOTE:** Even if you have nothing to disclose, you are still required to fill out the survey.

Key Points

- The survey will open in July and must be completed within a three-week timeframe.
- Individuals designated to take the survey will be sent a unique survey link via Rush email.
- The annual survey collects data from the previous Fiscal Year (FY), July 1st through June 30th.
- Disclose all professional external relationships/activities and all innovation and technology development.
- All remuneration (e.g., meals, all payments received, equity).
- The COI survey is maintained in the RUSH Research Portal (RRP).
- All users must use either Chrome, Firefox, or Safari, and must use a computer or laptop. Tablets and other portable devices are not supported.
- Failure to complete the survey may result in disciplinary action.

ACCESSING YOUR COI SURVEY

Check your email for your unique survey link and follow the instructions below to access your annual COI survey.

- 1) To access your survey, click the COI Survey ID link provided in the body of the email (e.g., COI-00012345).

Click your COI Survey ID link >>> **COI-00000000** **1**

- 2) When you reach the login page, log in to Rush's Research Portal (RRP) by clicking the **Rush SSO Login** button. You will be prompted to sign in with your Rush credentials.

Rush SSO Login

NOTE: Network accounts are automatically deactivated after 180 days of inactivity.

Please note the following for **login issues**:

- a) If your account has been disabled due to inactivity, contact RUSH's Help Desk at (312) 942-4357 for assistance in reactivating it. To ensure ongoing access to RUSH applications, please remember to log in at least once every six (6) months.
 - b) If your account is active and you are having trouble with your username or password, please call the Help Desk for assistance.
 - c) If your account is active but your password has expired, you can manually change your password at the following link: [Reset My Password](#).
- 3) From the main survey page, begin by clicking the **Create/Edit COI** button (located on the left under Pre-Submission).

Disclosure Status	Conflict of Interest (COI) Disclosure:
Pre-Submission	
Create / Edit COI 3	Discloser name:
View / Print Disclosure	Roles requiring this disclosure:
View Differences	

- 4) Click the **Continue** button to advance to the next section (lower right of the screen).

Exit Save **Continue** **4**

- 5) On the first page of the survey, you can update your demographics and review the COI policies.
- a) If your information is incorrect, go ahead and correct each field and then carry on with the survey completion. In the event of a name change, please finish the survey first; afterwards, notify us of your new name by emailing rrp@rush.edu so that your details can be updated in the Research Portal accordingly.

Name: _____
Department/Division/Section: _____

* Enter your direct phone number here:

* Enter your position title:

* Directly reports to Full Name:

* Directly reports to Email:

* Directly reports to Phone:

- b) After reviewing the related COI policies, click **Yes** and continue to the next page.

System COI Policy

- [Conflicts of Interest and Commitment Policy and Vendor Guidelines](#)
- [Competitive Bidding Policy](#)

RUSH Medical College

- [Prevention of Conflicts in Assessment and Promotion](#)

RUMC and ROPH

- [External Relationships and Financial Conflicts of Interest in Research Policy](#)
- [Procurement for Non-Capital Goods and Services Policy \(Research/Federal Grants\)](#)
- [Disclosure and Management of Conflicts of Interest by IRB Members Policy](#)

* I have read the RUSH System Conflict of Interest Policy: Yes No [Clear](#)

NOTE: Questions marked with a red asterisk (*) are required and must be answered before you can continue to the next page. If you cannot advance to the next page, make sure all the required questions have been answered.

- 6) Based on your role with RUSH, you will either be assigned one or more sections to complete:
- a) Administrators, corporate officers, and senior leaders will have been assigned the Institutional COI survey questions. Click [here](#) for brief instructions.
- b) Physicians, non-physician clinicians, faculty, and researchers will receive the clinician/research questions. Click [here](#) for brief instructions.

SURVEY INSTRUCTIONS FOR INSTITUTIONAL COI SURVEY QUESTIONS

Individuals with an administrator, corporate officer or senior leader role will be asked the Institutional COI survey questions.

- 1) The institutional COI survey questions are divided in three sections, Sections A, B, & C.

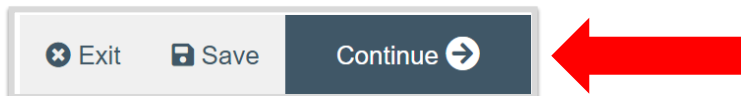
Section A. Section A asks questions about confidential information, financial interests, and business dealings with companies which currently conduct/or wish to conduct business with RUSH.

Section B. Section B contains a list of questions that you should consider any other transactions or interests with a company or investment, aside from those related to RUSH as a patient of a hospital, clinic, or other business owned or operated by RUSH.

Section C. When responding to the questions in Section C, disclose relationships with other persons you serve with (e.g. board directors, board committee members, officers, or key employees) as listed on Exhibit C of the survey.

NOTE: You do not have to disclose any privileged relationship (i.e., an attorney-client, doctor-patient, or clergy-communicant relationship).

- 2) Once you have responded to all the required questions for each section, click the **Continue** button to advance to the next page of the survey. If at any time you wish to stop and continue later, click the **Save** button, and then **Exit** the survey.



- 3) When you reached the **Submission Instructions** page, click [here](#) and carefully follow the instructions on how to submit your completed COI survey.

PLEASE NOTE: Your survey will only be considered complete once you have successfully submitted your disclosure.

SURVEY INSTRUCTIONS FOR CLINICAL AND/OR RESEARCH QUESTIONS

Individuals with a clinician and/or research role will be asked to answer the following two questions.

1) When you reach the **Company, Commercial Entity or Organization** section, answer these two required questions.

- a) **Question #1.** Have you or your immediate family members been involved in any of the following (regardless of the value)?
- b) **Question #2.** Have you accepted any of the following (regardless of the value)?
- c) If you answered 'Yes' to either of the questions, click the '+Add' button to enter the name of the company(ies) and continue to the next step.

1. * Have you or your immediate family members been involved in any of the following (regardless of the value)? Yes No [Clear](#)

- Consulting¹
- Expert Witness in Legal Proceedings (Legal Consulting)
- Equity (stock, shares, options)²
- Educational Presentation and Speaker Engagements³
- Board of Director/Advisory Board
- Scientific Advisory Committee
- License or Royalty Compensation and Intellectual Property Interests (including patent pending)
- Line management position⁴
- Venture Capital (For NSF Funded Researchers Only)⁵

2. * Have you accepted any of the following (regardless of the value)? Yes No [Clear](#)

- Business Courtesy/Gift(s) from any company that is not affiliated with RUSH (includes, but not limited to pharmaceutical, medical device and/or biotechnology companies. Includes all gratuities, gifts, loans, services, entertainment, or other favors.)
- Promotional Items⁶
- Travel Reimbursement (airfare, ground transportation, and lodging)
- Drug Samples⁷
- Accepted grants or donations for educational activities or events⁸
- Meals⁹
- Training Funds for Use of Medical Devices
- Stipends and/or paid living expenses from a foreign organization

If you answered 'Yes' to either of the above questions, please add each company, commercial entity, or organization from which you accepted payments, of any amount, in the previous 12 months or anticipate payment in the next 12 months, have an interest in, or have compensation.

+ Add

Company	Entity	Consulting	Expert Witness	Presentations	Directors/Advisory Board	Board of	Scientific or	License or	Equity	Educational	Business

There are no items to display

1a

1b

1c

2) Add a company.

- a) Type the name of the company in the box shown. As you type, select the correct name from the list that appears. If the name is not listed, type "Other" in the box.
- b) Answer Yes or No to each category that applies or does not apply to this relationship. **Note:** For each category that you select, you will be prompted to provide additional details following this page.

Add COI - Company Commercial Entity or Organization

Add Company, Commercial Entity, or Organization

Select the Company, Commercial Entity, or Organization and identify each item below as it applies to this relationship (you must select at least one).

* Select (if not listed, select 'Other' and enter below): [...](#)

For each category(ies) that have a disclosure, you will be asked to provide additional information on a later page:

- Consulting: Yes No [Clear](#)
- Expert Witness in Legal Proceedings (Legal Consulting): Yes No [Clear](#)
- Educational Presentations and Speaker Engagements: Yes No [Clear](#)
- Board of Directors / Advisory Board: Yes No [Clear](#)
- Scientific Advisory Committee: Yes No [Clear](#)
- License or Royalty / Intellectual Property (including patent pending): Yes No [Clear](#)
- Equity (stock, shares, options): Yes No [Clear](#)
- Business courtesies, Gifts, Promotional Items, Meals (above nominal value), Entertainment, and / or Reimbursed travel: Yes No [Clear](#)
- Drug Samples and / or Coupons: Yes No [Clear](#)
- Training Funds for use of Medical Devices: Yes No [Clear](#)
- Accepted grants or donations for educational activities or events: Yes No [Clear](#)
- Line Management Position: Yes No [Clear](#)

* Required

OK OK and Add Another Cancel

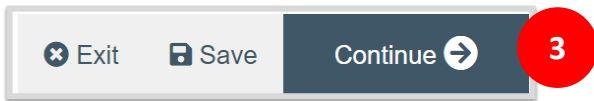
2a

2b

2c

- c) If you need to add more than one company, click 'OK and Add Another'. When you are done, click **OK**.

- 3) Once you have responded to all the required questions, click the **Continue** button to advance to the next section of the survey. If at any time you wish to stop and continue at a later time, click the **Save** button, and then **Exit** the survey.



- 4) When you reached the **Submission Instructions** page, click [here](#) and carefully follow the instructions on how to submit your completed annual COI survey.

PLEASE NOTE: Your survey will only be considered complete once you have successfully submitted your disclosure.

INSTRUCTIONS FOR SUBMITTING YOUR ANNUAL COI SURVEY

1) Once you have navigated to the **Submission Instructions** page, carefully follow each of the three (3) steps and click the **Continue** button; you will then be returned to the main page of your personal workspace to officially submit your survey.

Submission Instructions

- 1) Click 'Continue' in the lower right hand corner. This will take you back to the main page of your survey.
- 2) From the main survey page, click the "**Submit Disclosure**" button located on the left under My Activities.
- 3) Review the Attestation statement. After agreeing to the attestation statement, you will then receive an email confirming your disclosure has successfully been submitted.

Exit Save Continue →

2) **IMPORTANT:** In order to submit your survey, you must click the **Submit Disclosure** button (located on the left column under **My Activities**).

My Activities

Submit Disclosure

NOTE: Failing to do this step will cause your disclosure to remain in a pre-submission state and your disclosure will be considered incomplete.

3) If your disclosure is free of errors and all required information is included, you will receive the **Attestation** statement.

- a) Carefully review the Attestation statement
- b) Check the white box, and
- c) Click **OK** at the bottom of the page.

Submit Disclosure

The following action will submit your COI disclosure for review.

Attestation:

* I, Rose Garcia, hereby attest that the information contained in this disclosure is true, complete, and accurate.

I understand that RUSH and certain of its affiliates are charitable organizations that must engage primarily in activities that further their purpose in order to maintain tax exempt status and remain in compliance with federal and state statutes.

I understand that any false, fictitious, or fraudulent information, misrepresentations, half-truths, or omissions of any material fact, may subject me to discipline, including but not limited to suspension or termination of employment. I further understand that false, fictitious, or fraudulent information, misrepresentations, half-truths, or omissions of any material fact, may, in certain circumstances, subject me to possible criminal or civil penalties 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 within thirty (30) days during the period of performance and as required under RUSH policy should circumstances change which impact the responses provided herein or as required under RUSH policy.

I understand that I must promptly notify the Conflict of Interest Committee(s) (through Mary Keller, System Director in Corporate Compliance, Mary_G_Keller@rush.edu) of any change in the responses to each of the foregoing questions that may result from a change in circumstances, or from any new or potential financial interest, situation, activity, or conduct.

In order to submit your disclosure, you must agree with the above statement by clicking the check box and then click **OK**. If you are not ready to submit your disclosure, click **Cancel**.

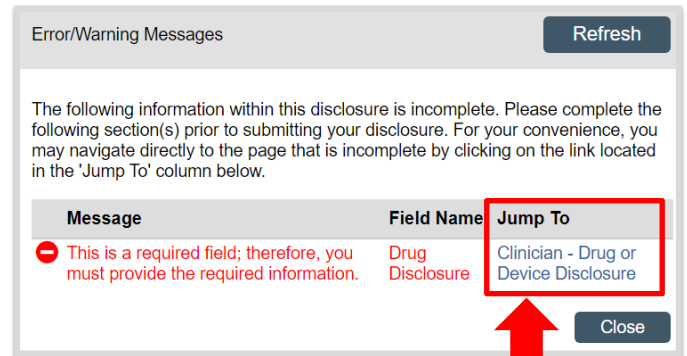
OK Cancel

4) After completing the attestation form, you will receive a confirmation email that your survey has been successfully submitted. **End**

TECHNICAL ISSUES

1) Submission Error/Warning Message

If you receive an error window after clicking the 'Submit Disclosure' button, click the link under the **Jump To** column to be taken to the relevant section of the survey. If you are missing more than one required information, you will see several red error messages. Be sure to click all the links to enter the missing information. Once you have filled in all the necessary fields, click the **Submit Disclosure** button again to complete the process.



2) "You do not have permission to view the requested page or the page does not exist"

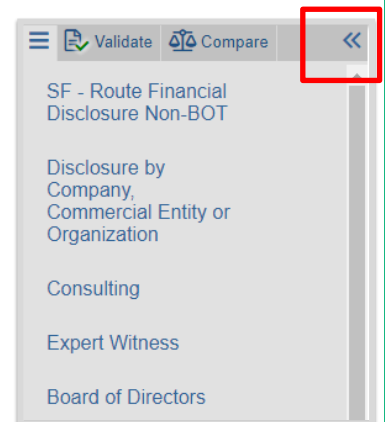
If you encountered an error message like this, it likely means that you are attempting to access a survey that does not belong to you. To move forward, use the unique access link specifically generated for you. Other links forwarded by someone else will not be recognized and will not allow you to access the survey. Please contact the COI Office if you cannot find your COI survey link.

3) Using a shared PC

When accessing the Rush Research Portal (RRP) on a shared computer, please ensure that it is not currently logged into another user's account. If another user is logged in, attempting to use your assigned link will result in an error, despite the link being valid. To prevent this, always log out of any active RRP session and then sign in using your personal credentials.

4) Survey navigation menu

If the navigation window is hidden, click the double-arrow symbol (<<) to open the menu. Here you can jump to different sections of the survey.



5) Other technical support with the survey

For additional technical support with the survey, reach out to rrp@rush.edu for assistance.

NOTE: The RUSH Help Desk or the RRP Staff cannot answer questions regarding the COI survey content or COI policies. For COI questions or concerns, please see [COI QUESTIONS / SUPPORT](#).

ADDITIONAL RESOURCES

For further information, click and follow the arrow links below:



▶ [COI Policies](#)



▶ [Vendor Guidelines](#)



▶ [COI FAQs](#)



▶ [CMS Open Payments](#)

COI SURVEY QUESTIONS & CONCERNS

Questions Regarding Conflict of Interest:

RUSH COI Office

Phone: (312) 942-5303, press option 3

Email: COI_Office@rush.edu or

Visit [RUSH's COI Website](#) for more information

Rush Copley Medical Center

Stacey Ries, RN, JD, CHC (she/her)

Senior Associate General Counsel

Phone: (630) 499-4721 | Fax: (630) 375-2833

Email: Stacey_A_Ries@rush.edu

DEFINITIONS

Accepted grants or donations for educational activities or events. This includes all education grants or donations made by commercial entities for programs that are not ACCME-accredited, including but not limited to: donations made to fund events or programs on or off RUSH's campus, including any donations used to reimburse travel and expenses related to attendance at such program or event. Note this does not include grants or donations made toward bona fide research projects.

Confidential information. Information of a sensitive nature of any kind and in any form concerning RUSH, including but not limited to its business operations, finances, planning, strategy, marketing and service areas, real estate, patient care activities, research, data on pricing and/or costs of services, employee compensation and/or intellectual property as well as internal quality control or legal documents, any disclosure of which to third parties will presumptively be considered injurious and damaging to the interests of RUSH.

Consulting. Refers to a relationship where an individual accepts personal or financial benefit for service related to the individual field or discipline, where a fee-for-service or equivalent relationship with a third party exists. Consulting includes but is not limited to: organizing or operating any educational program outside RUSH, working as an independent contractor, advising and providing a professional service, providing expert testimony on behalf of industry, serving as an officer, director, partner, paid consultant or employee (with contractual authority) of a commercial entity.

Drug samples. A free "gift" of drugs (intended for the purchase of prescription drugs) provided to a physician offered by a manufacturer and/or the manufacturer's representative (e.g., sales representative) and is intended to be provided to patients. It is a direct-to-consumer or "DTC" marketing of prescription drugs.

Educational Presentation and Speaker Engagements. An occasion when an individual has been asked to give a formal talk or presentation related to their institutional responsibilities or expertise. All presentations must be of one's own materials, not those created or supplied by drug or device companies or their agents. Presentations should be for the purpose of education and not for marketing or promotion. The content and format of the presentations should be of independence and control of the presenter. Include sponsored or reimbursed travel for the activity, unless it is paid by a governmental agency, another university or an institution of higher education. Participating in speakers' bureaus or other events sponsored by commercial entities if the presentation, lecture or talk by the person subject to this policy is for the direct or indirect purpose of promoting a specific commercial product or process or if the presentation, lecture or talk is part of an event that includes presentations, lectures or talks to promote a specific product or process. A commercial entity is any corporation, partnership, sole proprietorship or other legal entity organized for profit. An entity that

is not an Academic Institution, including for-profit corporations and commercial spin-offs or spin-outs from an Academic Institution is considered a commercial entity. Persons who have existing relationships with commercial entities as members of speakers bureaus or similar arrangements should sever those arrangements after 9/1/2011.

Equity (stock, shares, options). An ownership interest in any commercial or non-profit entity, including common stock, stock options, equity securities, and any right to acquire any options or other ownership interest as determined through reference to public prices or other reasonable measures of fair market value. Ownership such as receipt of royalties, fees or other remuneration or compensation from an entity as a result of professional services, patents, copyrights or other intellectual property rights. This does not include 'indirect' equity interest through mutual funds as the individual has no control over the business of the company. Equity interest(s) valued at \$0 is included as a disclosable financial interest.

Family Member. Any relation by blood or marriage, domestic partner and/or any person residing in the same household.

Foreign/international talent recruitment. Foreign/international talent recruitment (or similar) program is a foreign entity (government, that compensates an individual affiliated with RUSH in exchange for the agreement to transfer knowledge, expertise, or other intellectual assets to the foreign entity.

Indirect. Indirect means transactions through a business or investment interest.

Line management position. A line management position is a position that has authority and responsibility for achieving the major goals of the organization (e.g., president, CEO, COO, director).

Meals. Includes any meal except under the following allowable circumstances: (a) modest as judged by local standards; (b) is not part of an entertainment or recreational event; and (c) is provided in a manner conducive to informational communication.

Professional affiliation. Professional affiliation includes consultant, academic positions, work on a professional society and scientific appointments among others.

Promotional Items. Promotional items include any article of clothing, uniform, badge, pin, sign or other item that displays the name of a non-RUSH health care service, item or logo. This restriction does not include items that are used for patient education, such as models or anatomical drawings.

Venture Capital (For NSF Funded Researchers Only). For National Science Foundation (NSF) Funded Researchers Only: Venture Capital/Private Equity is a form of financing that investors provide to

researcher's start-ups that are believed to have long term growth potential. However, it does not always take a monetary form; it can also be taken in a form of technical or managerial expertise. Effective January 30, 2023, NSF expanded its definition of Significant Financial Interest (SFI) to include private equity (equity interests, venture, or other capital financing) interests regardless of value. All NSF funded researchers are required to disclose all private equity interests, venture, or other capital financing, in-kind contributions as well that support the research activity for use on their NSF funded project/proposal.