

In Development Proposals, Principal Investigators and Co-Investigators are required to answer fifteen questions pertaining to MIT Policy, Export Control, Conflict of Interest screening questions regarding Significant Financial Interest (questions 10-12), and Federal Sponsor compliance.

PHS/NIH Key Persons are presented with only the three Conflict of Interest screening questions pertaining to SFI.

Certification Questions (for Investigators)

- 1. Is your current space sufficient to carry out this project, and those already proposed?
- 2. Do you plan to carry out part of this work in any space other than that of the department, lab or center submitting this proposal?
- 3. Will you need to appoint individuals in a department, lab or center other than the one submitting this proposal?
- 4. Will you need to appoint visitors at MIT in order to carry out this project?
- 5. Will you use animal subjects?
- 6. Will you use human subjects?
- 7. Will you receive material or equipment, or information or software not publicly available, that might be subject to US export controls, including items originating outside the US (which are controlled when in the US)?
- 8. Will any part of this project be conducted outside the US (including subaward arrangements, but not including conferences)?
- 9. Will you send information, software, material or equipment outside the US?
- 10. Do you have a Significant Financial Interest in this sponsor? A Significant Financial Interest (SFI) is defined as salary, consulting, or other remuneration of \$5,000 or more, which you have received in the last 12 months, or expect to receive in the next 12 months; or any equity interest in a non-publicly traded company; or stock holdings in a company that is related to your area of research, and exceeds \$100,000.
- 11. Could the work contemplated in this project reasonably appear to affect a company or other organization in which you have a SFI?
- 12. Does this project contemplate any purchases from or subawards to a company or other organizations in which you hold a SFI?
- 13. If the sponsor for this proposal is Federal Have you lobbied, or are you aware of anyone who has lobbied government officials in support of this project? Lobbying includes oral or written communications to government officials regarding the adoption of program funds, or execution of program funds that would specifically support this project.
- 14. Are you presently debarred, suspended, proposed for debarment, declared ineligible, or voluntarily excluded from current transactions by a federal department or agency?
- 15. The information that I have contributed to this proposal is true, complete and accurate to the best of my knowledge. I understand that federal sponsors reserve the right to impose criminal, civil or administrative penalties for false, fictitious or fraudulent statements included in this proposal. *If this proposal includes a subaward to another organization, I confirm that subaward costs appear reasonable given the statement of work.

*Only Principal Investigators are asked to confirm information about a subaward in question 15. This text is omitted from the question for Co-Investigators.

Certification Questions (PHS /NIH Key Persons)

- 1. Do you have a Significant Financial Interest in this sponsor? A Significant Financial Interest (SFI) is defined as salary, consulting, or other remuneration of \$5,000 or more, which you have received in the last 12 months, or expect to receive in the next 12 months; or any equity interest in a non-publicly traded company; or stock holdings in a company that is related to your area of research, and exceeds \$100,000.
- 2. Could the work contemplated in this project reasonably appear to affect a company or other organization in which you have a SFI?
- 3. Does this project contemplate any purchases from or subawards to a company or other organizations in which you hold a SFI?

Getting Help

Applicability of COI Regulations

Your RAS Contract Administrator: https://ras.mit.edu/about-ras/staff/by-department

Research Administration Support Team

Kuali Coeus Questions or Technical Issues: ra-help@mit.edu

Include your Name, Contact information, Proposal Number and a brief description of the question or concern.

Other Resources

Quick Reference Cards:

http://kc.mit.edu/quick-reference-cards

Conflict of Interest Website:

http://coi.mit.edu/

COI Policy Questions or Issues coi-help@mit.edu