

# 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 who are 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.

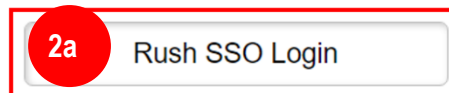
## ACCESSING YOUR COI SURVEY

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

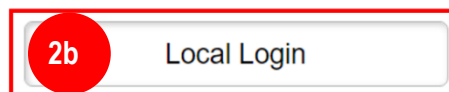
1) To access your survey, click the COI Survey ID link provided in the body of the email (e.g., COI-00012345).

2) When you reach the login page, follow the instructions below:

a) 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.



b) **RCMC Non-Employees:** Log in to Rush’s Research Portal (RRP) by clicking the **Local Login** button. You will be prompted to sign in with your Rush credentials.



3) Login issues. Please note the following for all login issues:

**NOTE: Network accounts are deactivated if a user has not signed in for 90 days or more.**

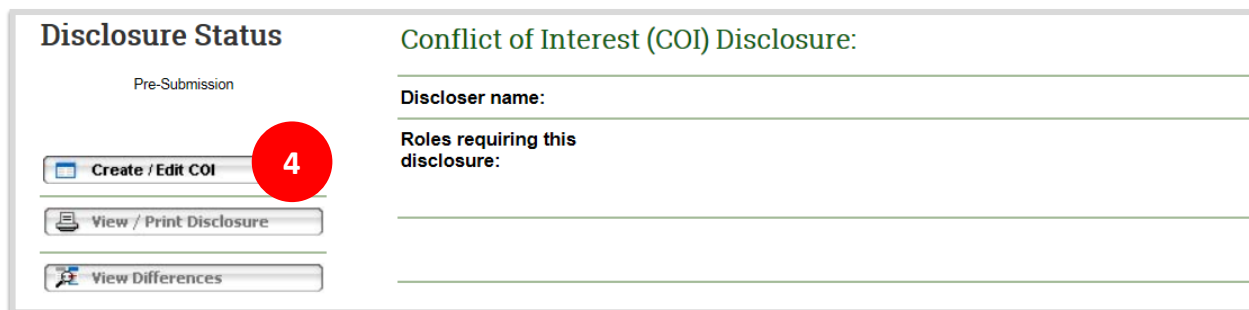
a) If your account has been disabled due to inactivity, please contact your Department Administrator for assistance in reactivating it. To ensure ongoing access to RUSH applications, please remember to log in at least once every three (3) months.

b) If your account is active and you are having trouble with your username or password, please call the Help Desk at (312) 942-4357 for assistance.

c) If your account is active and your password has expired, you can manually change your password at the following link: [Reset My Password](#).

d) **RCMC Non-employees.** Username or password issues, please call (312) 942-0287 or (312) 942-8613 for assistance.

4) From the main survey page, begin by clicking the **Create/Edit COI** button (located on the left under Pre-Submission).



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

**Conflict of Interest Disclosure Reporting**  
The RUSH Conflict of Interest Policy requires that you complete and return an annual disclosure. Please click Continue >> on the right side of this page to begin the Conflict of Interest disclosure.

Exit Save Continue → 5

- 6) On the first page of the survey, you can update your demographics and review the COI policies.

- a) If your information is incorrect, please update it here or send an email to [COI\\_Office@rush.edu](mailto:COI_Office@rush.edu) to make the corrections and continue completing the survey.

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: |

6a

- 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](#)

6b

**NOTE:** Each question with a red asterisk (\*) indicates a required field that must be answered before advancing to the next page.

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

## SURVEY INSTRUCTIONS FOR INSTITUTIONAL COI SURVEY QUESTIONS

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

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

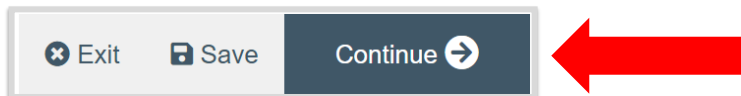
**Section A.** Section A asks questions about confidential information, financial interests, and business dealings with companies which currently conduct/or wish to conduct business with RUSH.

**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 only relationships with other persons you serve with (e.g. board directors, board committee members, officers, or key employees) as listed on Exhibit B 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 at a later time, click the **Save** button, and then **Exit** the survey.



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

### Helpful information:

#### Technical Issues

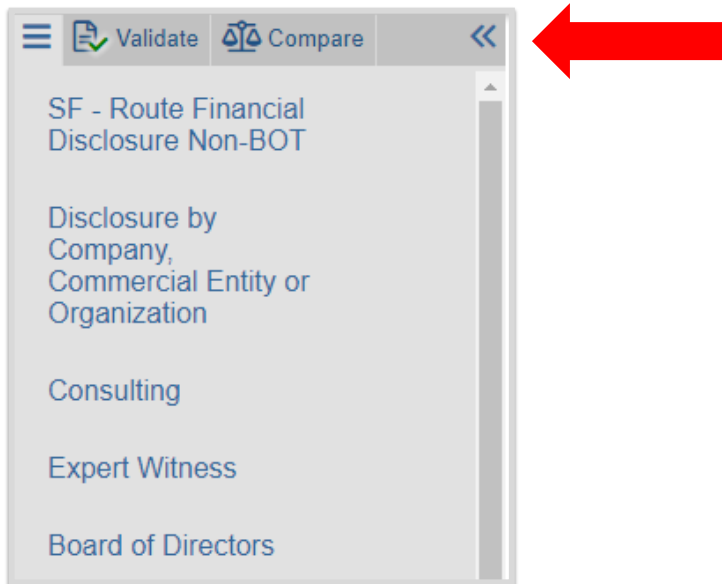
For help with common technical issues, please click [here](#).

#### COI Office Support

For assistance with this survey or have questions about RUSH's COI policy(ies), please click [here](#).

## Survey navigation menu

Click the navigation menu on the left and select the section to complete. If the navigation window is hidden, click the double-arrow symbol (<<) to open the menu.



## Definitions

Please refer to the [Definitions](#) section for clarification of associated terms and their definitions.

## Additional resources

For more information on RUSH's COI website, policies, or FAQs, please click [here](#).

## SURVEY INSTRUCTIONS FOR CLINICAL AND/OR RESEARCH QUESTIONS

Individuals with a clinical 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](#)

- Consulting<sup>1</sup>
- Expert Witness in Legal Proceedings (Legal Consulting)
- Equity (stock, shares, options)<sup>2</sup>
- Educational Presentation and Speaker Engagements<sup>3</sup>
- Board of Director/Advisory Board
- Scientific Advisory Committee
- License or Royalty Compensation and Intellectual Property Interests (including patent pending)
- Line management position<sup>4</sup>
- Venture Capital (For NSF Funded Researchers Only)<sup>5</sup>

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 Items<sup>6</sup>
- Travel Reimbursement (airfare, ground transportation, and lodging)
- Drug Samples<sup>7</sup>
- Accepted grants or donations for educational activities or events<sup>8</sup>
- Meals<sup>9</sup>
- 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 Scientific or Advisory Royalty License or Royalty Equity Educational Business Sponsorship Courtesy/Gratuities

There are no items to display

1b

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.

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

**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](#)

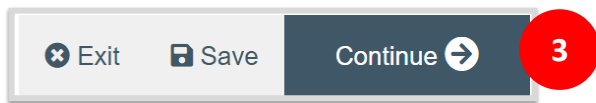
Required

2a

2b

2c

- 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.

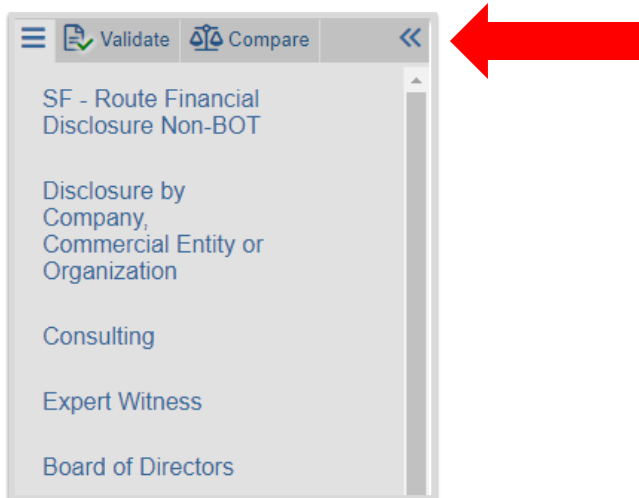


- 4) When you reached the **Submission Instructions** page, click [here](#) and follow the instructions on how to submit your completed annual COI survey.

### Helpful information:

Technical Issues. For help with common technical issues, please click [here](#).

Survey navigation menu. Click the navigation menu on the left and select the section to complete. If the navigation window is hidden, click the double-arrow symbol (<<) to open the menu.



COI Office Support. For assistance with this survey or have questions about RUSH's COI policy(ies), please click [here](#).

Definitions. Please refer to the [Definitions](#) section for clarification of associated terms and their definitions.

Additional resources. For more information on RUSH's COI website, policies, or FAQs, please click [here](#).

# INSTRUCTIONS FOR SUBMITTING YOUR ANNUAL COI SURVEY

1) When you reached the **Submission Instructions** page, be sure to follow the three (3) steps to submit your disclosure, then click the **Continue** button. You will be taken back to the main page where you can submit your disclosure.

**Submission Instructions** 1


- 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 disclosure, you **must** click the **Submit Disclosure** button (located on the left column under **My Activities**).

**My Activities**

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 **Submit Disclosure** 2

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**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 be issued an **Attestation Statement**.

- a) Carefully review the attestation statement
- b) check the white box, and
- c) click **OK** at the bottom of the page. You will then receive a confirmation email that your survey has been successfully submitted. **End**

3

**Attestation:**

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

I understand that RUSH and certain of its affiliates are charitable organizations that must engage primarily in activities that further their exempt 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 Stephanie Guzik, AVP in Corporate Compliance, Stephanie\_Guzik@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.

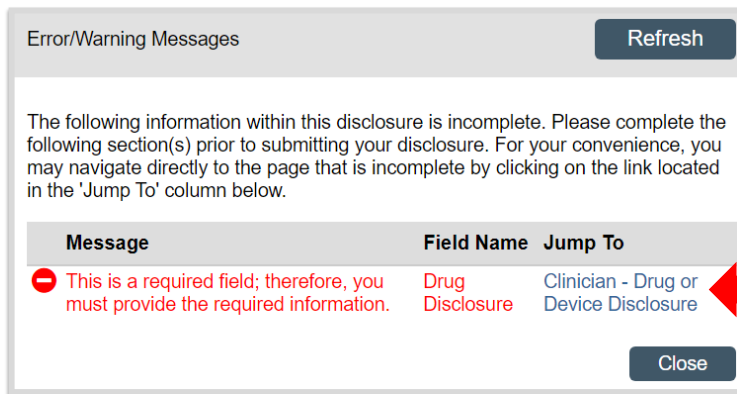
OK Cancel



## TECHNICAL ISSUES

Common error messages:

- 1) 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. See screenshot below. 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) Link is correct yet you still receive an error message.** If you are using a computer that is not yours and someone else has already signed into the Rush Research Portal (RRP), you will receive an error message even though the link is correct. To avoid this issue, make sure to log out from the RRP and sign back in with your own credentials.
- 4) Need additional assistance or have general COI related questions?**
  - a) Contact the COI Office at (312) 942-5303 and press option 3
  - b) Send an email to [COI\\_Office@rush.edu](mailto:COI_Office@rush.edu) or
  - c) Visit [RUSH's COI Website](#) for more information.

## COI OFFICE / SUPPORT TEAM

### COI Office Team:

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Stephanie Guzik, MBA, BSN, RN, CHRC

University Compliance Officer

Associate Vice President, Research Compliance, and Conflict of Interest

[Stephanie\\_Guzik@rush.edu](mailto:Stephanie_Guzik@rush.edu)

(312) 942-1296



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Mary G. Keller, RN, BSN, CCRC, CHRC

Director, Conflict of Interest

[Mary\\_G\\_Keller@rush.edu](mailto:Mary_G_Keller@rush.edu)

(312) 942-4485

Conflict of Interest



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Rose Garcia

COI Manager, Conflict of Interest

[Rose\\_Garcia2@rush.edu](mailto:Rose_Garcia2@rush.edu)

(312)942-0287

Corporate Compliance, Conflict of Interest Office



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Jake Boudreaux, BS

Compliance COI Specialist

[Jacob\\_M\\_Boudreaux@rush.edu](mailto:Jacob_M_Boudreaux@rush.edu)

(312) 942-8613

Corporate Compliance, Conflict of Interest Office



Address: 1653 West Congress Pkwy, Suite 601, Chicago, IL

Main number: (312) 942-5303, press option 3

COI Website: [Conflict of Interest Office | Office of Research Compliance | RUSH University](#)

## ADDITIONAL RESOURCES

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



▶ [COI Policies](#)



▶ [Vendor Guidelines](#)



▶ [COI FAQs](#)



▶ [CMS Open Payments](#)

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## 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.

**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.

**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.

**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.