

Conflict of Interest (COI) Annual Campaign and OneAegis FAQs

1. **Who must submit annual COI disclosures?** All faculty on the Einstein or Montefiore payroll, regardless of rank, and all post-doctoral fellows must submit annual COI disclosures annually in OneAegis. This includes: all faculty tracks (clinicians, educators, and staff-scientist tracks) and all post-doctoral fellows. COI disclosure is required regardless of whether you conduct human research.
2. **What is the new COI disclosure process?** Beginning December 2024, Einstein implemented a new COI disclosure system using OneAegis, a web-based COI and IRB tracking system. Faculty on the Einstein or Montefiore payroll and all post-doctoral fellows must submit COI disclosures on an annual basis in OneAegis during the month of December.
3. **When must COI disclosures be submitted?** COI disclosures must be submitted annually in December each year. Thereafter, you must update your disclosure within 30 days of any new financial interest.
4. **Why is Einstein implementing an annual COI disclosure requirement?** Submission of annual COI disclosure forms is a regulatory requirement for all federally funded research, including basic science, animal, and other non-human research. Concerns surrounding national security and foreign influence have placed increased importance upon COI disclosures. We are implementing an annual COI disclosure requirement in order to meet federal requirements.
5. **What happens if I have a new financial interest to disclose after the December disclosure period?** You must submit an updated disclosure within 30 days of any new financial interest. You can submit an updated COI disclosure at any point in time.
6. **I do not do research. Why do I need to complete COI training?** Einstein's mission reaches across research, education, and the welfare of patients. To ensure that all aspects of Einstein's mission are carried out free of conflicts, institutional policies require that all Einstein or MMC employed faculty members complete COI training. Additionally, federal regulations require that we train our employed faculty on COI requirements, even those that have not yet been listed on a grant application.
7. **How do I know if I am included in the annual campaign?** You will receive an email at your institutional email address if you must submit an annual disclosure. Individuals

included in the campaign are identified from Faculty Records, and accounts are automatically created at the time of hire. An email will be sent annually to all individuals included in the campaign with instructions to submit the COI disclosure.

8. **Are there any COI training requirements?** Yes, current COI training in CITI is required to submit a COI disclosure. Institutional policies and federal regulations require completion of COI training at least once every 4 years. You will not be able to submit your annual COI disclosure unless your COI CITI training is up-to-date.
9. **How do I complete COI training?** You may complete COI training at <https://citiprogram.org>. If you do not already have a CITI account, you will need to create one and choose Einstein as your affiliation. We have prepared [guidance for completing COI training](#) that can be found on the [Einstein COI office website](#).
10. **Do I need to send my CITI COI completion certificate anywhere?** No, we can verify training records directly through CITI.
11. **How do I submit my COI disclosure?** You can access OneAegis directly at <https://einsteinmed.oneaegis.com>. Additionally, the email notification you receive will include a direct link to OneAegis to submit your disclosure. You can log into OneAegis using your institutional email address and password. Your password is the same as for your email account and other Montefiore Einstein systems such as Epic. If you are having difficulty accessing or logging into OneAegis, please reach out to COI@einsteinmed.edu for assistance.
12. **Can I assign a delegate to submit my COI disclosure on my behalf?** No, you may not assign an individual to fill out or complete your COI disclosure on your behalf. COI disclosures are confidential and must be submitted directly by the individual with an electronic signature to affirm the veracity of the disclosure.
13. **Will I have to re-enter disclosures that I have already submitted in the previous COI disclosure system?** Yes, you will need to complete a new COI disclosure form in OneAegis. Thereafter, you will be able to copy your OneAegis disclosure form for future updates. We are unable to transfer over your previous responses as we have added and revised questions to obtain additional information needed for current federal regulations.
14. **What if I just submitted a COI disclosure before the start of the OneAegis COI campaign?** You will need to submit a COI disclosure again in OneAegis during the

month of December. Previous COI disclosures, even if they were just submitted during November, do not count for the following annual COI disclosure cycle.

15. **Will I be notified of upcoming deadlines?** You will receive automated notifications indicating upcoming deadlines, as well as past-due disclosures.
16. **What happens if I do not submit my annual disclosure?** A COI disclosure in the current annual campaign will be required for grant and IRB submissions. Funding for your awards may be delayed until your COI disclosure is on file. You will not be able to submit IRB applications until your COI disclosure is on file.
17. **How does this affect IRB submissions?** For faculty and post-docs included in the annual COI campaign, the annual COI disclosure serves as the up-to-date COI disclosure for Einstein IRB submissions for the associated year. Investigators who are not faculty, or faculty employed by other institutions, will automatically be prompted via email to submit transactional COI disclosures at the time of IRB submission.
18. **Where can I find more information about Einstein's COI policies?** Einstein's COI policies, including our [Comprehensive Conflict of Interest Policy](#), can be found on the [policies page](#) of the [Einstein COI website](#).
19. **Who should I contact with questions?** Please reach out to COI@einsteinmed.edu with any questions. You can also reach us via phone at (718) 430-2237.