



## OFFICE OF COMPLIANCE AND PRIVACY SERVICES

[www.uvm.edu/compliance/conflicts](http://www.uvm.edu/compliance/conflicts)

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**Conflict of Interest &  
Conflict of Commitment  
(COI/COC)**

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**UVMClick Website:** <https://www.uvm.edu/ovpr/uvmclick>

**UVMClick Login:** <https://coi.connect.uvm.edu/COI/>

**UVMClick Technical Support:** [uvmclick@uvm.edu](mailto:uvmclick@uvm.edu)

**COI/COC Support:** [coi.coc@uvm.edu](mailto:coi.coc@uvm.edu)

**FCOI Support:** [conflictofinterest@uvm.edu](mailto:conflictofinterest@uvm.edu)

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## FCOI/COI/COC PROCESSES:

Investigators, faculty involved in sponsored research, and exempt staff (salaried) use the UVMClick COI system to submit conflict of interest/conflict of commitment (COI/COC) certifications and disclosures. In addition to COI/COC certifications and disclosures, investigators also submit research certifications and disclosures (FCOI) at their next required submission date. Employees who are required to submit disclosures are referred to as *Covered Persons* and include all faculty, all exempt staff, and other officials as the President may designate.

### SUBMISSION:

- Investigators and faculty involved in sponsored research are required to use the UVMClick COI system to submit FCOI disclosures.
- Exempt staff (salaried) are required to use the UVMClick COI system to submit COI/COC disclosures.
- Faculty not involved in sponsored research submit an annual disclosure form in UVMClick; however, they have the option to provide the details either in UVMClick or on their annual workload form. Faculty not involved in sponsored research who do not submit an annual workload form must include the details in UVMClick.
- Investigators will complete their FCOI training on-line using CITI Program Training.

### POLICY REVIEW:

- Investigators and faculty involved in sponsored research should review and be familiar with UVM's [Financial Conflict of Interest in Research Policy](#). They should contact [conflictofinterest@uvm.edu](mailto:conflictofinterest@uvm.edu) with questions.

- All employees, including investigators, should review and be familiar with UVM's [Conflict of Interest/Conflict of Commitment Policy](#). Contact your supervisor or [department reviewer](#) with questions.

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## COVERED PERSON PRIMARY REQUIREMENTS

A *covered person* is a faculty member, an exempt staff member, or any other official designated by the President.

- **Complete Annual Certifications**

All **exempt staff** (salaried) must certify or disclose potential conflicts using the UVMClick COI system at least annually or as their circumstances change.

**Faculty not involved in sponsored research** must submit an annual disclosure form in UVMClick; however, they have the option to provide the details either in UVMClick or on their annual workload form. Faculty not involved in sponsored research who do not submit an annual workload form must include the details in UVMClick.

In addition, **Investigators and faculty involved in sponsored research** must certify or disclose whether or not they hold any Significant Financial Interests (SFIs) as defined in UVM's [Financial Conflict of Interest in Sponsored Research](#) policy. These disclosures must be made using UVMClick.

The UVMClick COI system will automatically send email notifications to remind disclosers when to login and complete their Annual Certification (disclosure form). Submitting disclosure forms annually will satisfy both regulatory requirements and university policy.

- **Respond In a Timely Manner**

All covered persons need to respond timely to inquiries from reviewers and, if requested, from those managing the institutional COI/COC and FCOI programs (this includes representatives from the offices of Compliance and Privacy Services, General Counsel, and/or Research Integrity/Vice President for Research).

- **Complete Annual Certifications**

All COI/COC disclosure forms with affirmative disclosures will be reviewed by a designated reviewer. Designated reviewers are generally Directors or Chief Officers

for those in administrative units and Chairs or Associate Deans for those in academic units.

Depending on the nature and details of the disclosure as well as the perceived level of risk the activity/relationship poses, additional review by those departments managing the institutional COI/COC program may also be warranted. Those departments include the Office of Compliance & Privacy Services, the Office of General Counsel and, if related to research, the Office of Research Integrity and the Office of the Vice President for Research.

- **Complete Research Initiated Certifications**

Investigators and faculty involved in sponsored research need to be responsive to email notifications related to proposals or awards at time of award acceptance. Investigators will be prompted to update their COI Disclosure Profile at time of award. If a significant financial interest (SFI) exists, UVM's Research Compliance Officer or UVM's FCOI Committee will review to determine if the SFI poses a Financial Conflict of Interest (FCOI).

- **Complete Training**

For investigators and faculty involved in sponsored research, FCOI Training is required every 4 years. Navigate to [CITI Program](#), our online source for FCOI Training. FCOI Training reminders will come directly from CITI (see more details below).

For all covered persons including faculty and exempt staff, COI/COC Training is also available. Covered persons are encouraged to complete it every 4 years. Navigate to the Office of Compliance and Privacy Services [Compliance Training Library](#) and click on Conflict of Interest/Conflict of Commitment, then click on COI/COC Disclosure Training for Covered Persons.

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## RESOURCES

Relevant university policies:

- [Financial Conflict of Interest in Sponsored Research Policy](#)
- [Conflict of Interest/Conflict of Commitment Policy](#)
- [Nepotism Policy](#)

**For investigators and faculty involved in sponsored research:**

A short review of what **financial interests** need to be reported: [Disclosing your Significant Financial Interest \(SFI\)](#).

**For all covered persons:**

A **description and examples** of what types of conflicts of interest and conflicts of commitment need to be reported: [Conflict of Interest FAQ](#).

For any additional questions regarding **Financial Conflict of Interest** in Sponsored Research (FCOI): contact [conflictofinterest@uvm.edu](mailto:conflictofinterest@uvm.edu).

For questions regarding **Conflict of Interest/Conflict of Commitment** (COI/COC): Contact your [designated reviewer](#).

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## TRAINING:

### INVESTIGATORS & FACULTY INVOLVED IN SPONSORED RESEARCH ONLY: CITI PROGRAM TRAINING

To complete or renew their FCOI training, investigators and faculty involved in sponsored research must visit the [CITI Program Training](#) (instructions provided).

- UVM's [FCOI Policy](#) requires Investigators and faculty involved in sponsored research to complete FCOI training every 4 years.
- If your FCOI training has expired, UVMClick COI will prompt you to complete CITI's FCOI online training at time of your Annual Disclosure or Research Initiated Certification, whichever comes first.
- FCOI Training reminders will come directly from CITI.

### ALL COVERED PERSONS

For all covered persons including faculty and exempt staff, COI/COC Training is also available. Covered persons are encouraged to complete it every 4 years. Navigate to the Office of Compliance and Privacy Services [Compliance Training Library](#) and click on Conflict of Interest/Conflict of Commitment, then click on COI/COC Disclosure Training for Covered Persons.

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### CERTIFICATION AND DISCLOSURE IN UVMCLICK COI

The first time you login to UVMClick COI, you will have to complete your Disclosure Profile. (**NOTE:** If you have a med.uvm.edu login, that login will not work. You must use your

uvm.edu login to access the UVMClick system.) You will initially be brought to the **Instructions and Policies section**. This page provides instructions, links to relevant policies, definitions, training requirements and compliance requirements.

Next, you will go to the **UVM Institutional Responsibilities section** where you will be asked to answer the following questions:

1. Are you involved in any regulatory or policy activities on behalf of UVM? For the purpose of this question, regulatory or policy activities refers to your ability to create, enact, or influence regulation or government policy (federal or state) that impacts the university. This does not include job responsibilities that occur in areas that are regulated, nor does it include your involvement in the development or implementation of internal UVM institutional or departmental policies or procedures.
2. As part of your UVM role, do you have any supervisory authority over or responsibility for making employment decisions (including volunteers) for any member of your family?
  - For the purpose of this question, family includes yourself, spouse or civil union partner, member of the same household, parent, grandparent, child or grandchild, sibling, cousin, aunt or uncle, niece or nephew, whether by blood, adoption, marriage, or domestic partnership. Family also includes step and in-law.
  - If you answer “yes”, you will also be prompted to disclose the name, title, and supervisory relationship to your family member and whether there are any management plans currently in place.
  - Do you have any authority for entering into contracts or agreements on behalf of UVM with any members of your family or any outside entity in which your family member(s) have an ownership or financial interest? If you answer “yes”, you will also be prompted to disclose the name, company, services provided and your family relationship.
3. Do you or any family member have a leadership position in, or a financial interest in, an outside entity that contracts with UVM or does business with UVM in any capacity (service agreements, research agreements, leases, sales agreements)?
  - If you answer “yes”, you will also be prompted to disclose the name, company, services provided and your family relationship.
4. Do you hold a position of executive leadership at the University of Vermont? In this instance, executive leadership includes the President and Provost as well as Vice

Presidents, Deans, Vice Provosts, and Chief Officers. It does not include directors, associate deans, managers, or supervisors. If your position is not listed in a blue or yellow box on [UVM's Organizational Chart](#), you should respond "no" to this question.

- Examples include CEO, President, Board of Directors or Trustees, Advisory Board Member, Scientific Director or other Officer, Executive Vice President, Senior Vice President, Vice President, or Partner.

The next section is entitled **Entity Disclosure Information** and you will be asked the following question:

The following question relates to any outside entities with which you or your immediate family (spouse, children) have a relationship to the extent that the business of the entity is related to your UVM institutional responsibilities. Such outside entities include domestic and foreign entities, whether private or public, whether they are an individual or a company.

Faculty not involved in sponsored research who provide details of their conflicts in their annual workload form may answer "no" to this question. Faculty not involved in sponsored research who either do not fill out an annual workload form or those who did not provide the details in their annual workload form but have interests/relationships to disclose, must answer "yes" and provide the details here.

Exempt employees and faculty involved in sponsored research must provide details on this form and do not have another option available.

1. Do you have any financial interests or relationships and/or outside activities to disclose within the previous 12 months or the next 12 months?
  - If you respond "Yes", a new page called "Entity Disclosure Information" is generated where you will be required to provide information on each company/external organization with which you hold a financial interest.
  - If you respond "No", you will skip to the Assurance and Certification section.

The relationship with an outside entity which you need to disclose includes the following and you will need to pick one to proceed:

### 3. ★ Disclosure types:

| Name   | Description  |
|--|--|
| <input type="checkbox"/> Equity/Ownership  | Stock, Stock Options, Venture Capital, Ownership Interest that reasonably relates to your UVM responsibilities. DO NOT INCLUDE: Investments, equity/ownership interest managed by a third party, such as a mutual fund or retirement fund, as long as the Investigator does not directly control the investment. Income, equity, or ownership interest from a publicly traded entity completely unrelated to your UVM responsibilities.    |
| <input type="checkbox"/> Outside Consulting                                      | Conducting R&D, educational work, clinical work in your private (non-UVM) capacity that reasonably relates to your UVM responsibilities. DO NOT INCLUDE: Research conducted at outside entities as part of a UVM sponsored project or UVM funded project. Collaborative UVM research performed during official UVM travel.   |
| <input type="checkbox"/> Other Professional Services                             | Journal editor/services, expert witness services that reasonably relates to your UVM responsibilities. DO NOT INCLUDE: Volunteering or community service activities, youth sports coaching, volunteering, etc. Outside employment unrelated to your UVM responsibilities. Serving as an external thesis/dissertation committee member. Speaking at academic conferences while representing UVM. Testifying in a case as an eyewitness.     |
| <input type="checkbox"/> Intellectual Property Rights                            | ( i ) Patent, Copyright, License, or Royalties (IP) paid directly to individual. DO NOT INCLUDE: Any IP Income received from UVM.  |
| <input type="checkbox"/> Divestiture and Cash Pay-out                            | Sale of equity   |
| <input type="checkbox"/> Reimbursed Travel                                       | Travel expenses reimbursed directly to you or paid directly on your behalf that reasonably relates to your UVM responsibilities. DO NOT INCLUDE: Travel reimbursed or paid by a federal, state, or local government agency, an institution of higher education (including UVM), an academic teaching hospital (including the UVMHC), a medical center, or a research institute that is affiliated with an institution of higher education. |
| <input type="checkbox"/> Board Service   | Compensated or Uncompensated. Board of Directors, Board of Trustees, Scientific Advisory, Data and Safety Monitoring, IRB as it reasonably relates to your UVM responsibilities. DO NOT INCLUDE: Activities not directly related to your UVM responsibilities.   |
| <input type="checkbox"/> Outside Employment                                      | Employment external to UVM that reasonably relates to your UVM responsibilities. DO NOT INCLUDE: Outside employment that does not directly related to your UVM responsibilities.   |
| <input type="checkbox"/> Other Appointments                                      | Compensated or Uncompensated. Positions, appointments, fellowships that reasonably relates to your UVM responsibilities. DO NOT INCLUDE: Outside appointments that do not directly related to your UVM responsibilities.   |
| <input type="checkbox"/> Prizes, Honoraria and Gifts                             | Prizes, speaking compensation, Honoraria and gifts that reasonably relates to your UVM responsibilities. DO NOT INCLUDE: Prizes and Honoraria that do not directly relate to your UVM institutional responsibilities.  |
| <input type="checkbox"/> Venture Capital/Private Equity in Faculty Startups      | Disclose the fund or venture capital firm or company that has made a capital contribution to the start-up.   |
| <input type="checkbox"/> Foreign Government Sponsored Talent Recruitment Program | Disclose participation. Compensated or Uncompensated. In kind contributions, research funding, promised future compensation, complimentary foreign travel, honorary titles, establishing a research lab or company.  |
| <input checked="" type="checkbox"/> Conversion Disclosure                        | For conversion only  |

If you answer “yes” to the above question, you will come to the **Disclosure Details section**. This section asks you to provide additional information for each employment, consulting, or other professional activity or service, paid or unpaid, that is not part of your UVM responsibilities.

1. Entity Name
2. Is the entity publicly traded?
3. Is it a foreign entity?
4. Relationship to discloser (Self, Spouse, Dependent Child)
5. Type of disclosure (from list above)

Based on the type of disclosure, additional questions may be asked.

The last section is the **Complete Disclosure Profile** section. This page summarizes the data that has been entered and asks the discloser to certify the following: “By completing your disclosure profile update you are verifying that all disclosure information is accurate and current.”

Once you submit your disclosure profile update, you are all set until either your circumstances change and you need to do an update, it is time for your annual update, or you are an investigator/faculty member involved in sponsored research and an updated disclosure is required for a funding proposal.