



University
of Vermont

OFFICE OF COMPLIANCE AND PRIVACY SERVICES

www.uvm.edu/compliance/conflicts

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

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

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

UVMClick Technical Support: uvmclick@uvm.edu

COI/COC Support: coi.coc@uvm.edu

FCOI Support: conflictofinterest@uvm.edu

HOW TO PROCESS A COI/COC¹ REVIEW

Overview

COI/COC certifications are reviewed by a manager, supervisor, or other unit leader as follows:

- Academic Units – Chair, Associate Dean, Dean, Vice Provost, Chief Officer or designee
- Administrative Units – Director, Vice President, Chief Officer or designee
- Larner College of Medicine – Senior Associate Dean for Research

A full list of the assigned departments reviewers can be found [here](#).

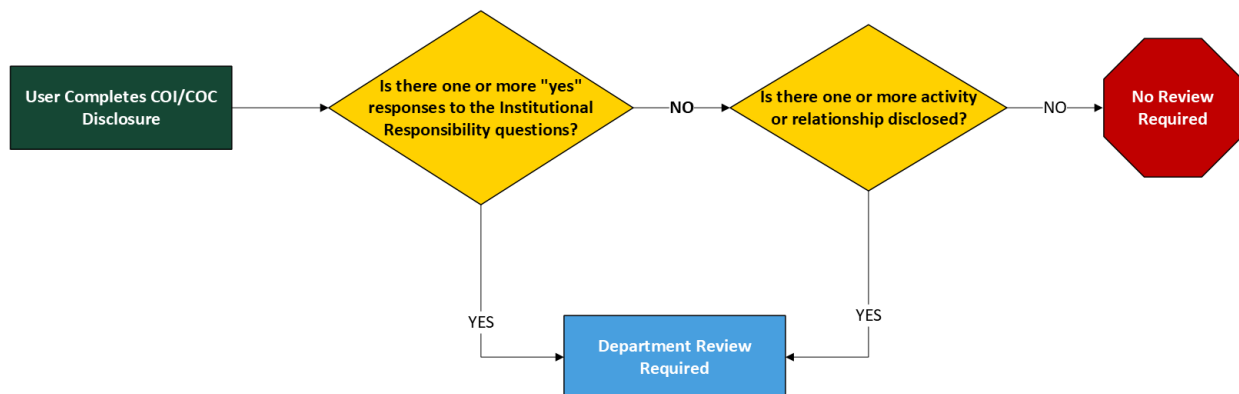
If any of the COI/COC disclosure questions have “Yes” responses, or if there is a noted disclosure, the submission will be sent into a department review status and an email notification will be sent to the assigned reviewer as listed above.

¹ This guide is for Conflict of Interest/Conflict of Commitment (COI/COC) certifications only. If you are looking for the FCOI process, please go to <https://www.uvm.edu/ovpr/research-integrity-financial-conflict-interest>.

If all of COI/COC disclosure questions have “No” responses and there are no noted disclosures, the submission will move to a “No Review Required” state. The certification will be retained in the UVMClick system; however, it will not require a unit review and department reviewers will not be notified of the submission. No action is needed from the unit reviewer on those in a “No Review Required” state.

Workflow

Here is a high level visual of the UVMClick-COI/COC workflow steps:



When a COI Disclosure Profile has been submitted, a COI/COC Certification is generated. It is routed to the assigned department reviewer via email. The email notification to the department reviewer alerts them that a COI/COC certification has been submitted and is ready for review.

This email is the trigger indicating that the reviewer needs to login (see “How to Login” at the end of this document for guidance) and begin their review.

When a reviewer logs in, they will be on their Dashboard, which is the starting point for finding items and performing many basic tasks. The most important for your review will be:

- My Inbox: Items that require the reviewer to take action.
- My Reviews: Items assigned to a reviewer. These are a subset of the items in My Inbox.

From here, reviewers take the appropriate step to perform the review:

- Disclosure does not create a conflict of interest/conflict of commitment – certification acknowledged and closed.
- Disclosure does or may create a conflict of interest/conflict of commitment that is low risk, common in higher education, and is in an area for which there is an email template.

- Disclosure does or may create a conflict of interest/conflict of commitment that is at a higher risk, generally not as common in higher education, and is of a type or level that requires a management plan that cannot be satisfied with a template email.

Notification to Review

When a Disclosure Profile is updated, a COI/COC Certification is generated. If the resulting COI/COC Certification requires review, the assigned department reviewers receive an email notification from conflict@uvm.edu. The notification email is automatically sent via the UVMClick COI system via internal workflow processes. Inside the email will be a link to the COI/COC Certification form that requires their review. Clicking the link will bring the reviewer to that specific COI/COC Certification form.

NOTE: The system may require a login. See “How to Login” at the end of this document for guidance.

Reviewing a COI/COC Certification

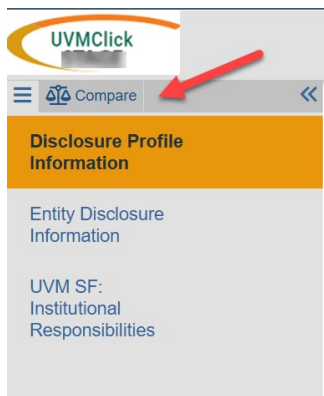
To review a certification in UVMClick:

1. Click the link provided in the email received from the UVMClick system and, if necessary, login.
2. From the workspace, under the “Next Steps” header, click “Review Certification”.

Next Steps



3. To see what changed between this and a previous version, click **Compare** on the Left Navigator and select the version to compare against.



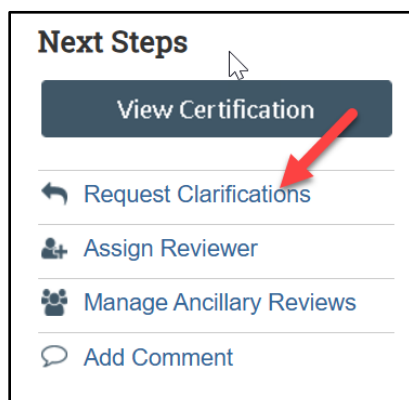
Unless there are disclosures that require management, follow the prompts on the screen to acknowledge that you have reviewed this disclosure. Management plans can be as simple as a template or can be an agreement that is drafted by legal counsel. It's all going to depend on the nature of the relationship/activity that is being disclosed. Disclosures common in higher education can often be satisfied with a template while those that are not as common or that reach a high level (dollar amount, time needed, for example) will need a more detailed, tailored management plan. If a management plan is needed, refer to that section below. Otherwise, you can acknowledge at this point and close it until the disclosure needs to be updated (annual update or circumstances changed).

Request Clarification on a COI/COC Submission

If you have questions for the discloser, use the **Request Clarification** activity to send a message. When the discloser submits a response, you will be able to review the response as well as any updates that were made before completing your review.

To request clarification:

1. From the project workspace, click **Request Clarifications**.

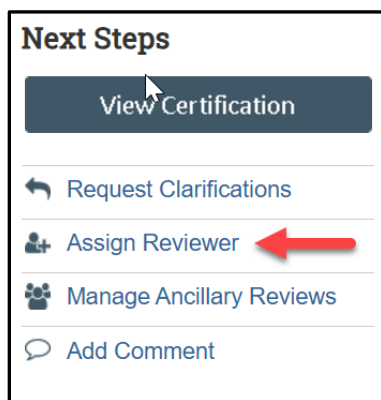


2. Type the details of your clarification request.
3. If required, add supporting documents.
4. Click **OK**. The discloser will receive an e-mail notification about your request.

The discloser will then be able to respond to your request and resend it back to you for review.

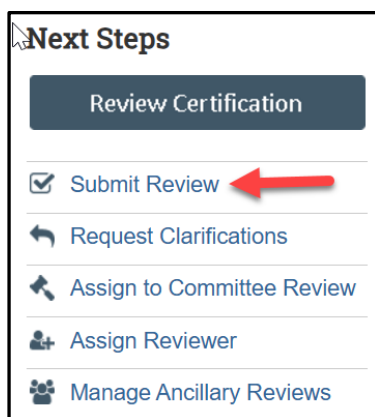
If the COI/COC Submission Requires an Assigned Reviewer

If, upon review, a disclosure may need or does need a management plan beyond that of a template email or you need assistance developing a management plan, a reviewer may request to redirect the review by clicking on the “Assign Reviewer” button. In Question 1. Select “Tessa Lucey” from the available list Add relevant comments and click “OK” button at bottom right corner. This action will move the review to Tessa Lucey in Compliance & Privacy Services. No more action is required at this point and the assigned reviewer may log out of UVMClick.



To submit review for certification:

1. From the certification workspace, click **Submit Review**.



2. Based on your decision, select **Yes** or **No** to the question " **Are the discloser's interests related to their job responsibilities?** "

3. If you select "yes" you will be asked "**Are there any conflicts with the discloser's interests?** "

Note: The input you provide will be used when making the final determination for this certification.

4. You can explain your recommendation in the Comments section.

5. Under Supporting documents, add any documents related to your review, such as a completed checklist.

6. When finished, click **OK**.

Create and Manage a Management Plan

Reviewers who have experience creating and managing management plans may be comfortable executing this step on their own. Other reviewers may be new at this or the details of the disclosure may be at such a level (i.e., dollar amount, amount of time, or nature of the relationship) that reviewers may want it reviewed by someone else. Whatever the situation is, the Office of Compliance and Privacy Services is here to help if and when a management plan is being contemplated. Email coi.coc@uvm.edu for assistance.

Management plans must be reduced to writing. This will either be done using [template language](#) for more common activities/relationships or a plan specifically designed for the activity/relationship when it does not fit a template. The management plan is then uploaded into UVMClick by the management plan creator (reviewer or by the Office of Compliance and Privacy Services).

To add the management plan document:

1. From the management plan workspace, click **Edit Management Plan**.

The screenshot shows a web interface for drafting a management plan. At the top is an orange header with the word "Drafting" in white. Below this, the "Created date:" is 12/2/2020 6:03 AM and the "Last modified date:" is also 12/2/2020 6:03 AM. Underneath is a section titled "Next Steps". At the bottom of this section is a dark blue button with the text "Edit Management Plan" in white. A red rectangular box highlights this button.

2. Click **Upload** below the management plan question to upload the document.
3. Choose the file to upload and click **OK**.
4. Click **Save** or **Finish**.

Once the management plan is created it needs to be sent to the discloser for their review and acceptance.

1. From the management plan workspace, click **Send to Discloser**.

Next Steps

- Edit Management Plan
- ☒ Send to Discloser
- ☒ Update Conflicts
- ☐ Assign Plan Creator

2. If required, add any comments and attach documents related to the management plan.
3. Click **OK**.

The discloser will then be able to accept the management plan or to provide comments or additional information. If that happens, you will be notified via email that there is an update and be able to respond

If a management plan is being developed that is not a template, a monitor may be required. In that case, the monitor will be further required to satisfy their requirements as outlined in the management plan.

Completing a COI/COC Submission

In order to move the disclosure form along in the process, follow the instructions on the screen. Remember that you must either acknowledge and close or upload a management plan and close.