



The University of Vermont

OFFICE OF AUDIT, COMPLIANCE AND PRIVACY SERVICES

www.uvm.edu/compliance

B159, Billings Library, 48 University Place

Burlington, VT 05405

P: (802) 656-3086

E: compliance@uvm.edu

To: All Faculty and Staff

From: Tessa Lucey
Director of Compliance Services and Chief Privacy Officer

Date: February 22, 2021

RE: Conflict of Interest/Conflict of Commitment

For more than 10 years, it has been UVM's policy that all faculty and staff disclose all potential conflicts of interest and conflicts of commitment (COI/COC). While the requirement to report conflicts is not new, the requirement to submit an annual disclosure form is. Like the majority of research universities, **UVM is now requiring all covered persons to file an annual report**, regardless of whether they currently have a conflict of interest or conflict of commitment. For the purpose of this requirement, covered persons mean **all faculty** (regardless of FTE) and **all exempt staff working .5 FTE or more**. If you are a covered person, you will be required to fill out an annual disclosure form.

Recently there has been increased focus on COI/COC issues by federal programs that support UVM. To meet our oversight responsibilities and remain compliant with reporting requirements, we are updating our disclosure process to match that of our peer institutions. In addition, UVM's [Conflict of Interest and Conflict of Commitment Policy](#) (COI/COC) is being updated to include this new requirement. We expect the updated policy to be posted on the [Institutional Policy Website](#) shortly.

Reportable Activities

To ensure we are meeting current federal requirements, covered persons are required to disclose any employment, consulting, or other professional activity or service, paid or unpaid, that is not part of the individual's UVM responsibilities. Submitting an annual disclosure form is required whether you have a conflict to disclose or not. We are currently working on an FAQ page and will provide that link once the site is live.

Disclosure protects you and protects the University. Disclosure does not mean that the activity is prohibited. By reporting, you enable UVM to review the activity, and if the activity presents a conflict, determine if it can be properly managed to mitigate individual and institutional risk. Failing to disclose potential conflicts means that the University's ability to provide assistance in the event of an allegation of impropriety is hampered.

Submission Requirements

I am pleased to announce that we have a simple, web-based means to complete the reporting process. UVM's existing [UVMClick](#), currently used by principal investigators for conflict-reporting purposes, is being updated to accommodate this new campus-wide disclosure process.

Covered persons will be notified when they are due to submit their first disclosure form. We will begin roll-out of the new reporting process in the Larner College of Medicine on March 1st. Employees in other units will begin submitting disclosures between October 15th and October 31st.

If you have been involved in sponsored research at UVM, you are already familiar with UVMClick, the on-line conflict of interest reporting system.

If you have not been involved in sponsored research activities at UVM, [UVMClick](#) will be new to you and we will offer training on use of the system. Similarly, we will also be providing training for reviewers.

Review and Acknowledgment:

Disclosure forms will be reviewed by your supervising unit and, for sponsored researchers, by the existing research FCOI process. The reviewing officials for covered employees are as follows:

Research:

- Researchers – review/acknowledgment will be provided by the Office of Research Integrity AND the responsible official as listed under Academy or Administration as applicable.

Members of the Academy not engaged in sponsored research:

- Faculty – by the dean or designee.
- Deans – by the provost or designee.

Administration:

- Exempt staff working .5FTE or more – by the chief officer, vice president or designee.
- Chief Officers or Vice Presidents – by the president or designee.

Training

In the coming weeks, those required to submit a disclosure form will receive additional information and training. The training will include information on disclosure requirements, as well as instructions on how to fill out and submit a disclosure form. Reviewers will also receive additional information and training specific to their responsibilities.

Thank you. Working together, we can help mitigate individual and University risk associated with conflicts of interest and commitment.