
Requirements
1. UVM’s Financial Conflict of Interest (COI) in Sponsored Research Policy requires all Investigators (anyone responsible for the design, conduct, or reporting of sponsored research, not just the Principal Investigator) to disclose whether or not they have any Significant Financial Interest related to their Institutional Responsibilities.
2. Investigators cannot create Significant Financial Interest disclosures until they have completed and registered COI Training.
3. Disclosures must be updated annually.
4. If a new Significant Financial Interest has been obtained, an existing disclosure must be reviewed and updated within 30 days of the date it was discovered or acquired.
5. COI Training must be completed once every four (4) years.

Getting Started
1. Login to UVM’s Significant Financial Interest in Sponsored Research Disclosure System
   - SPA Home Page Logins Section, or
   - https://spogi.uvm.edu/UVM_COI/
2. Click “log in” link
3. If required, enter your UVM Net ID and Password
4. You can now select one of the following actions:
   a. Complete conflict of interest Training
   b. Create a new annual disclosure
   c. Report new travel

Complete COI Training
1. Click the “Complete conflict of interest Training” link.
2. A web based slide show will open to the “Financial Conflict of Interest in Sponsored Research.”
3. Read each slide and click Next to advance to the next slide.
4. The last page contains a link “Proceed to Quiz” that will allow you to test your knowledge about the Financial Conflict of Interest in Sponsored Research. A result of 80% or more good answers will allow you to register the completion of your training.
5. IMPORTANT: If you answer correctly more than 80% of the questions, click the link “Exit and Record Training”.
5. On the new page, click the “Click this link to register your completion of UVM's COI Training Module” button. If asked for your authentication, enter "CAMPUS\[UVM NetID]" for your User Name.
6. On the new page, click the “Register” button.
7. You will receive an email confirmation that your training has been completed and logged.
8. Close the browser window.
9. The next time you login to the UVM COI Application, your main screen will display your training status and the date the training will need to be renewed.
Complete a new COI Financial Interest Disclosure

☐ The system will not allow any disclosures to be submitted if the COI training has not been completed within the last (4) years.

☒ Investigator(s) involved in a UVM sponsored project must submit a disclosure, whether or not they have significant related financial interest(s).

☒ Investigators must submit their disclosure at least once a year.

☒ Investigators must submit a new disclosure whenever there are new or substantial changes in financial interests.

Click the “Complete a COI Disclosure” button. There are two choices to select from:

No Significant Financial Interest

➤ The first choice reads: “I have NO significant financial interest related to my institutional responsibilities. If I acquire such an interest, I agree to disclose it within 30 days.” If true, proceed as follows:

☒ Select this choice and click submit button.

☒ You will receive a message and an email verifying that your disclosure has been submitted along with information that your disclosure will expire in one year.

☒ You will receive an email reminder from Sponsored Project Administration (SPA) 30 days before your annual disclosure’s expiration.

Significant Financial Interest to Disclose

➤ The second choice reads: “I have ONE OR MORE significant financial interests related to my institutional responsibilities. I will promptly complete and return the Financial Conflict of Interest Disclosure Form (sent by email when you click the Submit button).” If true, proceed as follows:

☒ Select this choice and click submit button.

☒ The screen will refresh and provide further instructions for obtaining and completing the required form. (see Appendix A for a sample form)

☒ You will receive a confirmation email that your selection has been logged.

The email also contains a link to the required form.

If You Don't Know

The following table summarizes which outside financial interests should be disclosed:
What constitutes an SFI (if related to your institutional responsibilities and held by you, your spouse or children) – within the past 12 months:

<table>
<thead>
<tr>
<th>Nature of SFI</th>
<th>Threshold</th>
<th>Excluded (Do Not Disclose)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Compensation and/or other payments for service</td>
<td>Exceeds $5,000</td>
<td>• any compensation received for lectures, seminars, teaching engagements, relating to:</td>
</tr>
<tr>
<td></td>
<td></td>
<td>o federal, state, or local government agencies,</td>
</tr>
<tr>
<td></td>
<td></td>
<td>o a domestic institution of higher education,</td>
</tr>
<tr>
<td></td>
<td></td>
<td>o an academic teaching hospital,</td>
</tr>
<tr>
<td></td>
<td></td>
<td>o a medical center,</td>
</tr>
<tr>
<td></td>
<td></td>
<td>o a research institute that is affiliated with an institution of higher education,</td>
</tr>
<tr>
<td></td>
<td></td>
<td>(the “Special Entities”),</td>
</tr>
<tr>
<td></td>
<td></td>
<td>• service on advisory committees or review panels relating to one of the Special Entities, or</td>
</tr>
<tr>
<td></td>
<td></td>
<td>• compensation received from UVM (or UVMCC funds for faculty with double-employment)</td>
</tr>
<tr>
<td>Equity interests in a publicly-traded entity</td>
<td>Value at time of disclosure exceeds $5,000*</td>
<td>Interests in any entity through personal retirement accounts and mutual funds</td>
</tr>
<tr>
<td>Equity interests in a non-publicly-traded entity</td>
<td>0</td>
<td>Interests in any entity through personal retirement accounts and mutual funds</td>
</tr>
<tr>
<td>Intellectual property rights and interests upon receipt of income related to such rights and interests</td>
<td>Exceeds $5,000</td>
<td>Royalties received from UVM funds, and unlicensed intellectual property that does not generate income</td>
</tr>
<tr>
<td>Sponsored or reimbursed travel</td>
<td>0</td>
<td></td>
</tr>
<tr>
<td>-----------------------------</td>
<td>---</td>
<td></td>
</tr>
<tr>
<td>Applies only to research submitted to PHS funding or any funding from agencies following PHS COI regulations</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Travel administered through UVM funds, and travel reimbursed or sponsored by one of the Special Entities (see definition above).

*when aggregated with any compensation received from that company, e.g. If the equity is valued at $2,000, and you receive $3,000 in compensation from that same company, you need to disclose.*

- If you are unsure which type of disclosure is required, please contact conflict@uvm.edu for clarification.
Completing the Disclosure Form (see Appendix A – Sample Disclosure Form)

1. Download the disclosure form from the email you received after completing the aforementioned step (a Word document).
2. Provide the information requested. The goal is to give to the reviewer a good understanding of what your significant financial interest is, and what the business of the company with which your interest lies is, and answer the questions in the spaces provided in the form.
3. While completing the form, pay particular attention to the following:
   - Indicate the InfoEd # numbers of the proposals to which your potential conflict relates.

   You can obtain a list of the proposals upon which you are listed by opening the COI online application and clicking the link: “View a list of the awarded and pending research proposals upon which you are named.”
   - Describe how any financial interest disclosed may be, or may appear to be, affected by the design, conduct or reporting of research (Question 8).
   - Indicate what plans or actions you think should be considered to manage, reduce, or eliminate the conflict (Question 9).
4. After you have completed the form, save a copy and send it as an email attachment to the UVM designated institutional official at ConflictofInterest@uvm.edu
5. The designated institutional official will review the information you provide and contact you for follow up.
6. Please see the FAQ's for more information about how your potential conflict might be handled.
Complete a new COI Travel Disclosure

*Important Note:* The system will not allow any Travel Disclosures to be submitted if the COI Training has not been completed within the last four (4) years.

**Click “Report New Travel”**

1. The screen will refresh.
2. Fill in the online form
3. Click **Submit**, or if more travel disclosures are to be submitted, click **“Submit and add another”**.
4. When you are finished, click the **Logout** button or click the “**COI Main**” link to return to the main screen
5. You will receive an email confirmation for each travel disclosure you submit.