FCOI New Processes

- last updated 02-11-19

Starting March 1, 2019

- Investigators will use the new UVMClick-FCOI system to submit Certifications and Disclosures
- Investigators will complete their FCOI training on-line using CITI Program Training

Investigators’ Primary Requirements

- Complete Annual Certifications. All Investigators must certify or disclose whether or not they hold any Significant Financial Interests (SFIs). The UVMClick-FCOI system will automatically remind Investigators when to login and complete their Annual Certification. Annual Certifications will satisfy the regulation that a disclosure be made at time of proposal submission.

- Be responsive to Research Initiated Certification update requests at time of award acceptance. All Research Initiated Certifications where an SFI exists will be reviewed by UVM’s Research Compliance Officer or UVM’s FCOI Committee to determine if the SFI is a Financial Conflict of Interest (FCOI).

- Complete FCOI Training. 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.

Resources

- For an in-depth understanding of the university policy: UVM’s University of Vermont Financial Conflict of Interest in Sponsored Research Policy

- For a quick review of what financial interests need to be reported: UVM Policy - Disclosing your Significant Financial Interest (SFI)

- For any additional questions: contact UVM’s Research Compliance Officer, Victoria Jones, L.L.M at Victoria.Jones.1@uvm.edu or at 656-1329.
Training in CITI Program Training

- Investigators must use the [CITI Program Training](#) to complete or to renew their FCOI training.
- UVM FCOI Policy requires Investigators to complete FCOI training every 4 years.
- If your FCOI training has expired, UVMClick-FCOI 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.

Certification and Disclosure in UVMClick-FCOI

The first time you login to UVMClick-FCOI, you will have to create your Certification and Disclosure information. UVMClick-FCOI system will not have “converted data” from your previous disclosures.

There are generally three sections within the UVMClick-FCOI system:

1. **Certification Section**

   The Certification section contains these three questions:

   1. Do you hold a position of executive leadership at the University of Vermont?
   2. Are you directly or indirectly involved in any research at the University of Vermont?
   3. Are there any external organizations or companies with which you have a significant financial interest – which includes interests held by you, your spouse or dependent children?

   For a quick review of what financial interests need to be reported: [UVM Policy - Disclosing your Significant Financial Interest (SFI)](#)

   - If you respond “Yes” a new page called “Disclosure Details” is generated where you will be required to provide information on each company / external organization with which you hold a significant financial interest.
   - If you respond “No” you will skip to the Assurance and Certification section.

2. **Disclosure Details Section** (this section only appears if you said (above) that you have SFIs to disclose)

   The Disclosure asks you to provide additional information for each SFI.

   1. Name of external organization or company
   2. Relationship to discloser (Self, Spouse, Dependent Child)
   3. Type of Significant Financial Interest
      - Equity (shares / options) in external company
      - Consulting, advisory, or speaking compensation
      - Editorial compensation
• Intellectual Property Rights (License / Royalties paid directly to individual)
• Reimbursements (excluding sponsored travel)
• Sponsored Travel
• Board of directors compensation) that must be asks you to provide information related to your significant financial interests such as company information, relationships, disclosure types and dollar value.

3. **Assurance and Certification Section**
The Assurance and Certification section is the last section. This page summarizes the data and asks the discloser to certify that “My disclosures are up-to-date and accurate and I confirm that I understand and agree with the above statements.”

Visit the [UVMClick-FCOI web site](#) for

- News and Updates
- User Guides
- Tip Sheets
- Frequently Asked Questions