FCOI/COI/COC PROCESSES - updated 11/04/2022

• Investigators use the UVMClick-FCOI system to submit both research certifications and disclosures and general COI/COC certifications and disclosures at their next required submission date.

• All faculty and exempt staff use the UVMClick-FCOI system to submit COI/COC disclosures.

• Investigators will complete their FCOI training on-line using CITI Program Training.

• For all non-investigators, discloser training is available on the Office of Compliance and Privacy Services “Compliance Training Library” webpage.

• Investigators should review and be familiar with UVM’s Financial Conflict of Interest in Research Policy. They should contact 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 with questions.

DISCLOSER’S PRIMARY REQUIREMENTS

• Complete Annual Certifications. All faculty and exempt staff must certify or disclose potential conflicts using the UVMClick system at least annually or as their circumstances change. In addition, Investigators must certify or disclose whether or not they hold any Significant Financial Interests (SFIs). The UVMClick-FCOI system will automatically 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 Timely. All disclosers need to respond timely to inquiries from reviewers and, if requested, from the COI/COC oversight authorities (this includes representatives from the offices of Compliance and Privacy Services, General Counsel and, if applicable, Vice President for Research). All COI/COC disclosure forms with affirmative disclosures will be reviewed by a designated reviewer. Depending on the nature and details of the disclosure, additional review by staff in the offices of Compliance and Privacy Services, General Counsel, and/or Vice President for Research may also be warranted.

• Complete Research Initiated Certifications. Investigators need to 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

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1 All non-exempt staff must disclose potential conflicts to their supervisor as they arise.
the SFI is a Financial Conflict of Interest (FCOI).

- **Complete Training.** FCOI Training is required every 4 years. COI/COC Training is available and all employees are encouraged to complete it every 4 years. For FCOI Training, navigate to [CITI Program](#), our online source for FCOI Training. FCOI Training reminders will come directly from CITI. For COI/COC Training, navigate to the Office of Compliance and Privacy Services [Compliance Training Library](#) and click on COI/COC Disclosure Training for Covered Person.

### Resources

- For an in-depth understanding of the university policies:
  - [Financial Conflict of Interest in Sponsored Research Policy](#)
  - [Conflict of Interest/Conflict of Commitment Policy](#)
  - [Nepotism Policy](#)

- For a quick review of what financial interests investigators need to report: [Disclosing your Significant Financial Interest (SFI)](#)

- For a description and examples of what types of conflicts of interest and conflicts of commitment need to be reported by faculty and staff, including investigators: [Conflict of Interest FAQ](#).

- For any additional questions regarding Financial Conflict of Interest (research): contact conflictofinterest@uvm.edu or call 656-1329.

- For questions regarding general Conflict of Interest/Conflict of Commitment: Contact your department’s designated reviewer.

### Training in CITI Program Training (Investigators)

- Investigators must use the [CITI Program Training](#) (instructions provided) 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

Don’t let the name fool you. The UVMClick-FCOI system is used for both FCOI and for general COI/COC Certifications and Disclosures.

The first time you login to UVMClick-FCOI, you will have to create your Certification and Disclosure information.
Certification Section – Institutional Responsibilities section

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 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?

3. Do you have any authority for entering into contracts or agreements with any members of your family?

4. Do you or any family member have a position in or a financial interest in an outside UVM entity that enters into agreements with UVM or does business with UVM in any capacity (service agreements, research agreements, leases, sales agreements)?

5. 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.

6. Are you listed as key personnel on any research project at UVM submitted for funding to, or awarded by, an external sponsor?

Certification Section – What to Disclose section

The following question relates to any outside entities with which you or your immediate family (spouse, children) have a relationship. Such outside entities include domestic and foreign entities, whether private or public, whether they are an individual or a company.

The relationship with an outside entity which you need to disclose includes:

- Equity
- Monetary income or compensation
- Intellectual property rights
- Sponsored travel
- In-kind resources (e.g. office/laboratory space, equipment, supplies, employees, students, and visiting scholars)
- Financial support through active or pending grants, awards, cooperative agreements or contacts that are not managed by UVM
- Professional affiliations (e.g. positions and scientific appointments)
- Institution- or government-funded “talent recruitment” programs that result in affiliations with institutions other than UVM
- “Gifts” where items or funds are received with conditions attached or deliverables expected in return that are not managed by UVM Foundation
- Other types of support

1. Do you have any relationship, as listed above, to disclose in relation to the previous 12 months or the next 12 months?
   - 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 financial interest.
• If you respond “No”, you will skip to the Assurance and Certification section.

**Disclosure Details section**

This section only appears if you said (above) that you have potential conflicts to disclose. The Disclosure 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. Name of external organization or company
2. Relationship to discloser (Self, Spouse, Dependent Child)
3. Type of Interest
   • Stock or 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
   • Other (Select other if you are disclosing any of the following:
      ▪ Professional affiliations (e.g. positions and scientific appointments), current or pending participation in “talents” or similar-type programs
      ▪ In-kind contributions (e.g. office/laboratory space, equipment, supplies, employees, students, and visiting scholars)
      ▪ Financial support through active or pending grants, awards, cooperative agreements or contracts or oral agreements that are not managed by UVM
      ▪ “Gifts” where items or funds are received with conditions attached or deliverables expected in return)

**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