FCOI/COI/COC Processes - updated 05-13-21

Starting March 1, 2021

- Investigators will continue use the UVMClick-FCOI system to submit Certifications and Disclosures; however, investigators will see new COI/COC questions at their next required submission date.

- Faculty regardless of FTE and exempt staff < .5 FTE will now use the UVMClick-FCOI system to submit Certifications and Disclosures.

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

- For all non-investigator disclosers, review the COI/COC policy and contact your supervisor with questions.

**Discloser’s Primary Requirements**

- Complete Annual Certifications. All disclosers must certify or disclose potential conflicts of interest and conflicts of commitment. 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. Annual Certifications will satisfy regulatory requirements and university policy.

- All disclosers need to respond timely to inquiries from reviewers and from the COI/COC Review Group. All COI/COC certifications and updates will be reviewed by a dean/designee (faculty) or by a chief officer/vice president/designee (staff). Additional review by the COI/COC Review Group may also be warranted.

- 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 the SFI is a Financial Conflict of Interest (FCOI).

- Complete Training. FCOI and COI/COC Training is required every 4 years. For FCOI Training, 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 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: UVM Policy - Disclosing your Significant Financial Interest (SFI)

- For a description and examples of the types of conflicts of interest and conflicts of commitment that need to be reported: Disclosing Potential Conflicts of Interest, Conflicts of Commitment and Nepotism Under UVM Policies.

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

- For questions regarding COI/COC: Contact your Dean, Chief Officer or Vice President.

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.
Certification Section – Institutional Responsibilities section

1. Are you involved in any regulatory or policy activities on behalf of UVM?

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?

6. Are you directly or indirectly involved in any research at the University of Vermont? This includes, but is not limited to, being listed on any sponsored funding proposal, awarded grant, IRB, or IACUC submission.

Certification Section – What to Disclose section

1. During the past 12 months or during the next 12 months, have you been or will you be engaged in an activity, outside your scope of employment at UVM where you receive compensation (monetary or in-kind support), or any position or scientific appointment, that is directly related to the academic/professional/research capacity for which you were hired at UVM from any individual or organization, whether private, local or foreign?

   • If you answer “yes” to this question, then: 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 by Investigators: UVM Policy - Disclosing your Significant Financial Interest (SFI)

   For a quick review of what conflicts of interest or conflicts of commitment need to be disclosed by faculty and staff: Disclosing Potential Conflicts of Interest, Conflicts of Commitment and Nepotism Under UVM Policies.

   ➢ 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