A UVMClick – Financial Conflict of Interest (FCOI) Update:

When is Go-Live?

- UVMClick – FCOI is scheduled to Go live, March 1.

What is UVMClick – FCOI?

- UVMClick – FCOI is a module in our new electronic research administration (eRA) system - UVMClick.
- Replaces UVM’s homegrown FCOI Disclosure system.
- Replaces UVM’s homegrown FCOI powerpoint training with CITI’s on-line, FCOI Training Course.

As an Investigator, Is there Anything I should be Doing?

- Other than reading this update, No action is being requested.
- UVMClick – FCOI system will automatically remind Investigators when to login and complete their annual FCOI certification/disclosure.

What is SFI vs FCOI?

- Significant Financial Interest (SFI) means a financial interest that could directly and significantly, affect the design, conduct, or reporting of externally funded research. Investigators using UVMClick – FCOI will either certify no SFI or disclose SFI.

- Financial Conflict of Interest (FCOI) means a Significant Financial Interest (SFI) that could directly and significantly, affect the design, conduct, or reporting of externally funded research. All disclosed SFI will be reviewed at time of award by our Research Compliance Officer or the FCOI Committee to determine if the disclosed SFI is a FCOI.

Who Needs to Submit a Disclosure?

- UVM FCOI Policy requires disclosures be made by all “Investigators”.
- “Investigator” is defined as the Principal Investigator (PI), Project Director (PD) or any other person, regardless of title or position, who is responsible for the design, conduct, or reporting of research proposed to, or funded by, external sponsors, under grants, contracts,
cooperative agreements, or other awards for research.

**When Do I Submit a Disclosure?**

- Annual certification/disclosures are required by all Investigators. UVMClick – FCOI system will automatically remind Investigators when they must login and complete their annual certification/disclosure.
- The annual certification/disclosure satisfies the requirement that a disclosure is made at time of proposal submission.
- If an annual certification/disclosure is not present at time of proposal submission, SPA will trigger an event that directs the Investigator to login and complete a disclosure.

**New Faculty and Other New Hires conducting Research (after Go Live)?**

- All new faculty or any other new hire, regardless of title or position, who will be responsible for the design, conduct, or reporting of extramural supported research, and has yet to complete a FCOI disclosure, should immediately login to UVMClick – FCOI, after Go Live, and complete their first annual FCOI certification/disclosure.

**Research Certifications At Time of Award Acceptance?**

- At time of award acceptance, for those disclosures that indicate a Significant Financial Interest (SFI), SPA will trigger a Research Certification update.
- All research certifications where a SFI exists will be reviewed by our Research Compliance Officer or the FCOI Committee to determine if the SFI is a Financial Conflict of Interest (FCOI).
- Where a FCOI exists, award funds may not be released into PeopleSoft financials until the FCOI is either eliminated or managed with a management plan.

**FCOI Training?**

- UVM FCOI Policy requires, Investigators to complete FCOI training every 4-years.
- Current training expiration dates have been migrated from our legacy system to UVMClick – FCOI.
- If your FCOI training has expired, UVMClick – FCOI will prompt you to complete CITI’s FCOI on-line training at time of your annual disclosure or research certification, whichever comes first.
- CITI is our on-line FCOI Training source.
- Always login to CITI through the “Log In Through My Institution” portal.
- FCOI Training reminders will come directly from CITI.
- Award funds may not be released into PeopleSoft financials until all Investigators are FCOI trained.

**Resources:**
Thank You,

Victoria Jones, LL.M. | Research Compliance Officer
University of Vermont
Research Administration and Integrity
340 Waterman | 85 South Prospect Street
Burlington, VT 05405-0160
P: 802-656-1329 | Victoria.Jones.1@uvm.edu | research-integrity