

VCU Research Financial Conflict of Interest (FCOI) Management Matrix

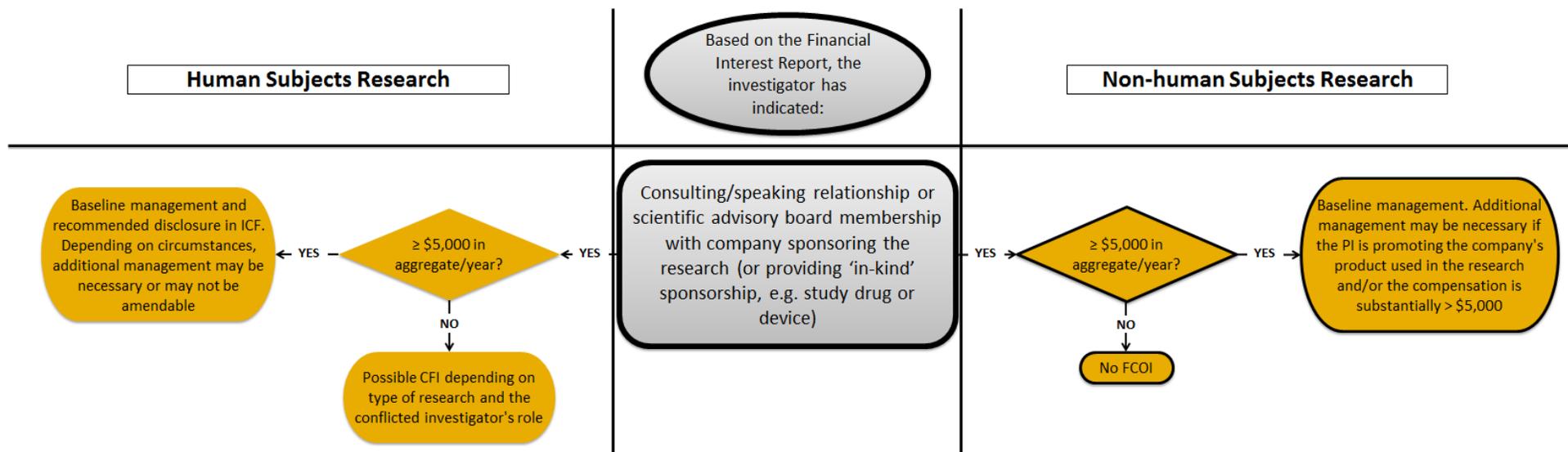
Directions: The middle column lists types of competing or conflicting financial interests an ‘investigator’ may have in an entity that is related, or could appear to be related, to the research to be conducted under a proposed project. An ‘investigator’ is an individual who has responsibility for the design, conduct, or reporting of research, **regardless of title or role**. The column on the left (human subjects research) and the column on the right (non-human subjects research) list management options depending on the circumstances of conflicting interests.

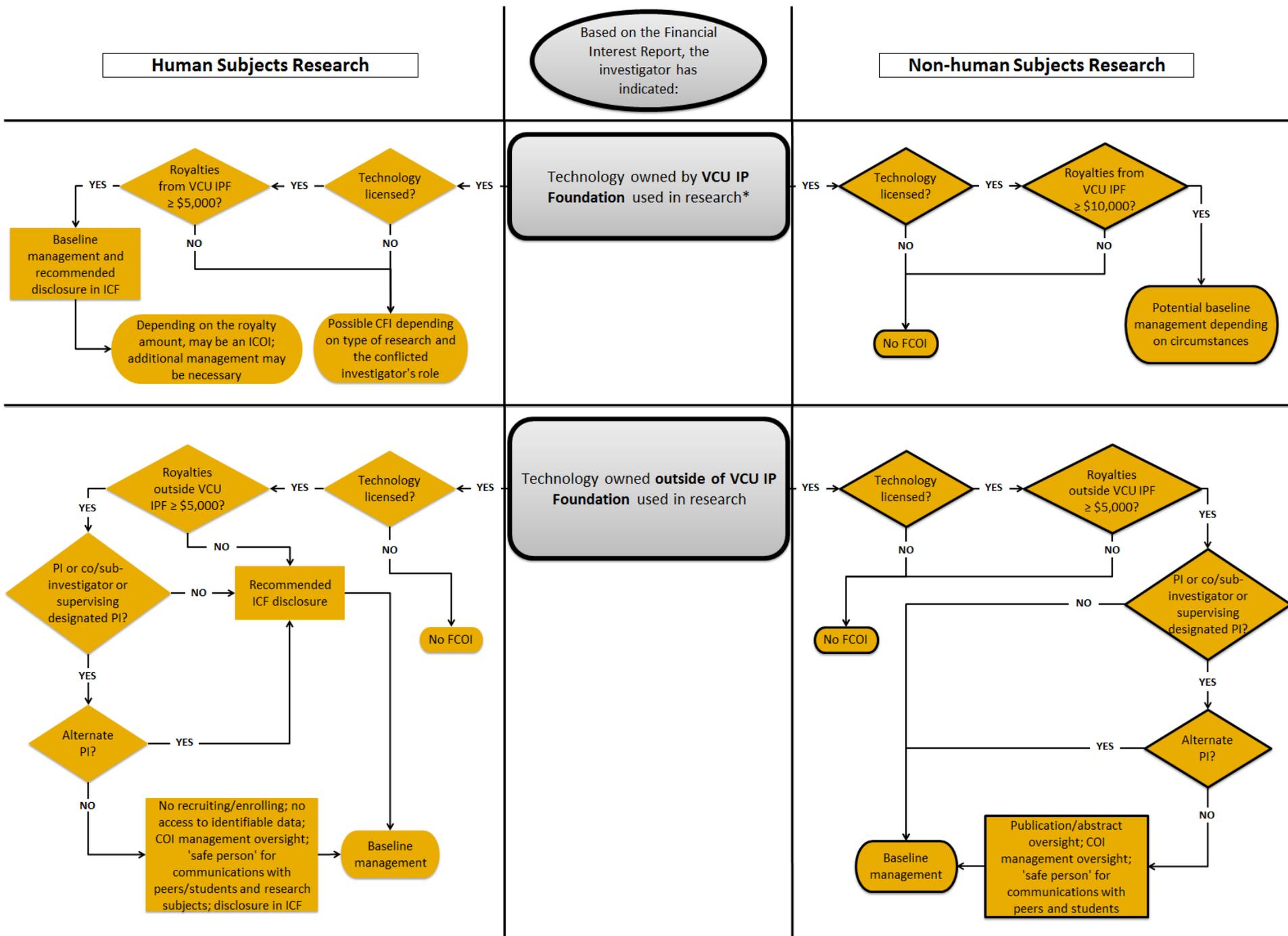
Note: Using the matrix as a guide, the COI Committee makes COI determinations on a case-by-case basis. The IRB/IACUC may require additional management that pertains to subject protections and welfare. **Advance discussion about COI management is encouraged. Contact the COI team at AIRS@vcu.edu.**

Definitions:

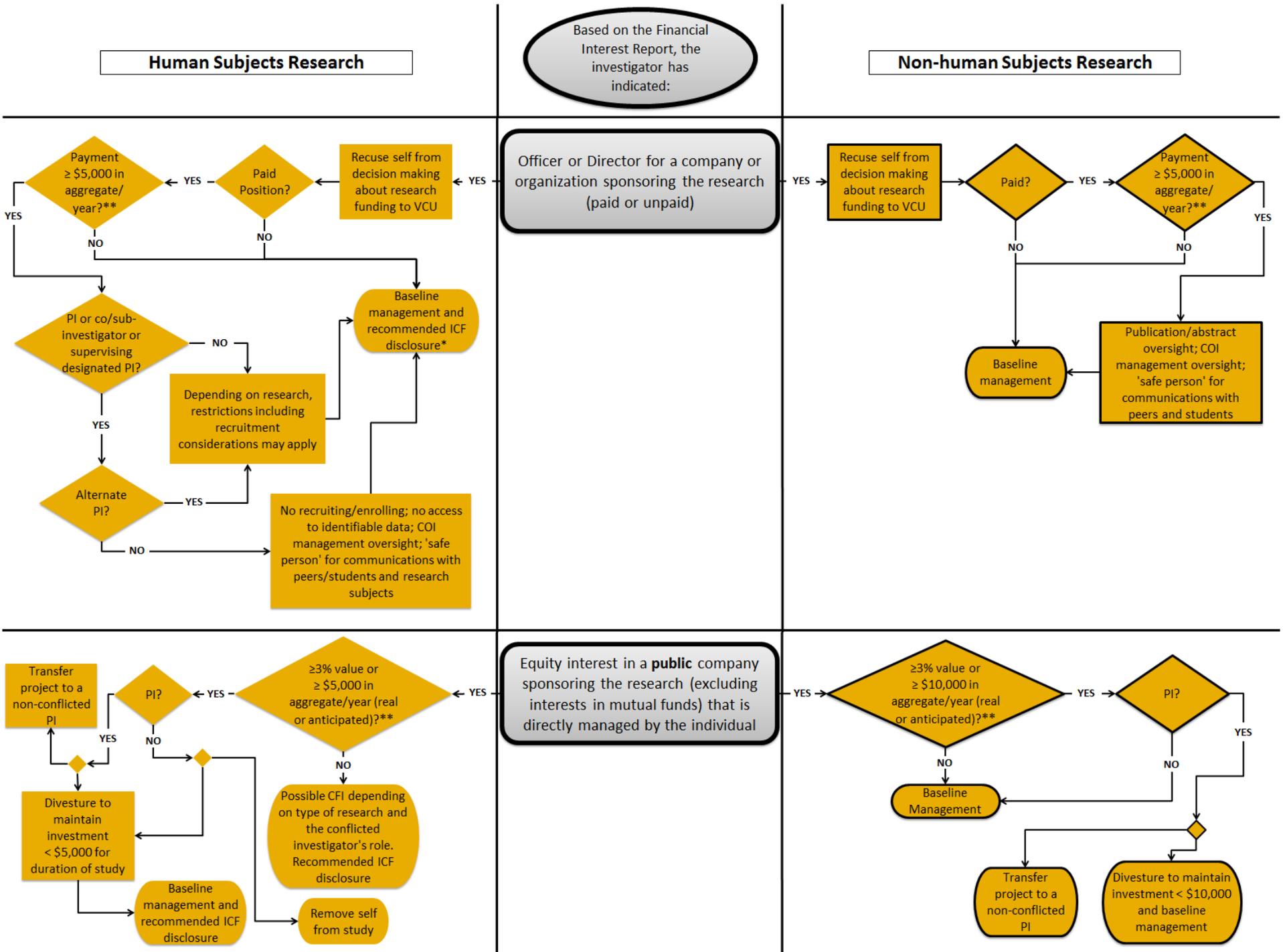
Baseline Management	Disclosure in submissions for publication/presentation and to students, trainees, and, depending on type of research, co/sub-investigators. Applies to all managed research.
Informed Consent Form (ICF)	Explains to potential participants the nature of the research project; why they are candidates for the research; what risks, benefits, and alternatives are associated with the research; and what rights they have as research subjects.
Competing Financial Interest (CFI)	Issued for financial interests <\$5,000 at the discretion of the COI Committee depending on the type of research and the conflicted investigator’s role. Subject to internal management and is not reportable to funding agencies.
Institutional Conflict of Interest (ICOI)	A situation in which the financial interests of the University or financial interests of covered members exceeding \$100,000 might influence or reasonably appear to affect institutional activities involving research. Such influence can emanate from individuals among VCU leadership who hold positions of trust, as well as within the university itself, its entities, and its holdings.
State-prohibited Contract	Equity interest ≥3% value, ≥\$5,000 annual income (real or anticipated), or significant investment levels may pose a state-prohibited contract under § 2.2-3106 of the Code of Virginia <i>State and Local Government Conflict of Interests Act</i> , requiring recommendation of a C.8. exception.

Possible COI management plan scenarios (subject to individual circumstances)



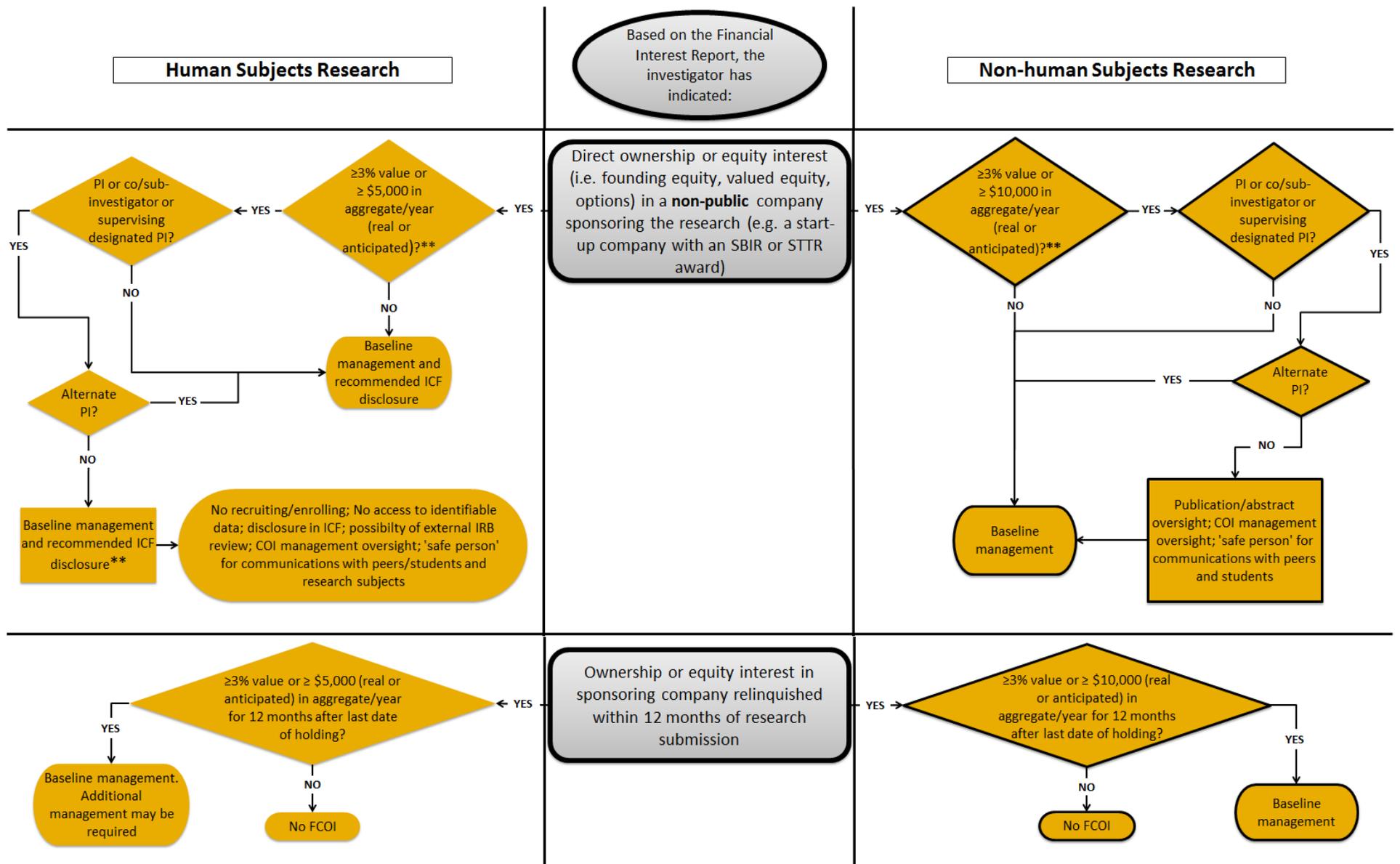


* Not reportable to the NIH

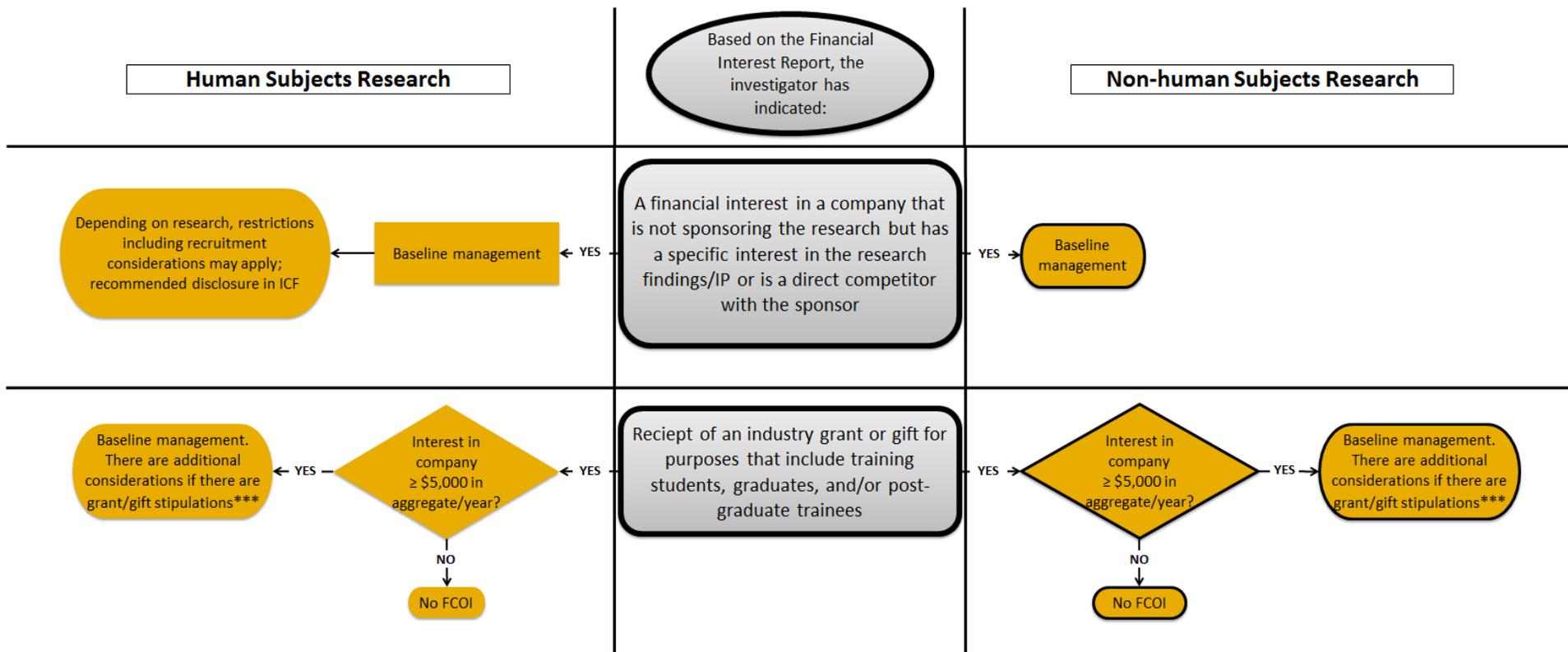


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** May represent a state-prohibited contract requiring recommendation of a C.8. exception, which is generally not allowed if the award to VCU is to be subcontracted to the company



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*** To mitigate COI, all industry-sponsored training grants should be submitted through the Office of Sponsored Programs via a non-conflicted PI.