

# Annual Update of the Financial Interest Report (FIR) in the Activity and Interest Reporting System (AIRS)

➤ Due July 1<sup>st</sup>

Office of Research Integrity and Ethics  
Conflicts of Interest in Research Program



# Key Definitions

- **[Activity and Interest Reporting System \(AIRS\)](#)**

*A secure Research Administration Management System (RAMS) that contains reported financial interests held by the investigator and any member of his or her immediate family*

- **Financial Interest Report (FIR)**

*The report in the AIRS containing reported financial interests, which is reviewed in the context of specific research projects to identify interests that may appear to be a conflict of interest (COI)*

# COI in Research

- A COI can arise in situations in which financial or other personal considerations have the potential to compromise or bias professional judgment and objectivity.
- Potential COI are not unusual in a modern academic setting but must be addressed in order to provide transparency and to protect research integrity.
  - Financial or non-financial interests can yield conscious or subconscious bias in the conduct and/or interpretation of research.
  - Financial COI can simply present an appearance of compromising an investigator's professional judgment in conducting or reporting research.
  - While financial interests with outside entities are not intrinsically unethical, they threaten research integrity if not reported, identified, and managed.
  - Unidentified COI can be especially problematic in human subjects research if the investigator's objectivity appears to be compromised.

# When to Report Financial Interests

- On an annual basis
  - Due July 1<sup>st</sup> for all PIs and COI Investigators on active or pending proposals or protocols
  - Proposals and/or protocols will not move forward until the FIR annual update is completed.
  - An annual update is required regardless of when you last updated your FIR and even if there are no FIR changes.
- Within 30 days after any of the following circumstances:
  - A new financial interest is obtained that has not been previously reported
  - Additional remuneration for an interest that has already been reported
  - A change in the research relatedness of a financial interest to a given research project

# COI Investigator

*Describes any individual (regardless of title, role, or position) who is responsible for the design, conduct, or reporting of research*

- When designating *COI Investigator*, independence and responsibility should be comparable/near comparable to that of the PI. The individual's role in the project, rather than their title, and the degree of independence with which those individuals work should be primary considerations.
- At a minimum, the PI and the student/trainee investigator of a student project are COI Investigators.

# Annual Update Notifications

- The annual update period opens on May 10<sup>th</sup>. The update is due by July 1<sup>st</sup>.
  - An email will be sent from AIRS@vcu.edu to indicate the system is turned on for the annual update.
  - An annual update notification will be sent from the Vice President of Research and Innovation to all active investigators.
  - Reminder notifications will be sent out weekly from AIRS@vcu.edu to those who have not completed the annual update.
- Each investigator enters his or her own financial interests into the AIRS by logging in with their eID & password.
  - If outside VCU, use the [VPN](#) to enter the AIRS.

# Submitting your FIR

- To submit your FIR, check the box before clicking the 'Finish' button.



End of Smartform:  
**FINANCIAL INTEREST REPORT**

I have accurately completed my Financial Interest Report (FIR) required by VCU Policy. I understand that I must update my FIR within 30 days upon acquiring or discovering:

- a new financial interest in an entity not previously reported
- an additional interest in a previously reported entity
- new intellectual property that has been disclosed to VCU Innovation Gateway
- new research relatedness with any reported financial interest

Click **FINISH** below to affirm agreement and fully submit the FIR.

Save | Exit | Hide/Show Errors | Print... | Jump To:

Finish



# Successful FIR Completion

- Once you have finished updating your FIR (by checking the box and clicking 'Finish'), the 'Current State' converts to 'Active.'
- If the 'Current State' is NOT 'Active', you will continue to receive annual update email notifications.
  - You can verify the state on your FIR page.

**Current State**

**Active**

**My Financial Interest Report Forms**

 View Financial Interest Report

 Printer Version

 View Differences

# COI in Research Training

- The Public Health Service (PHS) [\*Promoting Objectivity in Research\*](#) regulations and VCU policy require COI training for all investigators at least every 4 years. Investigators currently within a 3-4 year time window will automatically be prompted to complete the short training module preceding their annual update.
- Training completion is automatically documented in the investigator's FIR page.

History	Comments	Archive	Documents	Additional Information	Reviews	Management Plans	Snapshot
Activity		Author				<input checked="" type="checkbox"/> Activity Date	
	COI Training Completed						6/14/2016 1:50 PM
	Annual Financial Interest Reporting Begins					Administrator, System	5/10/2016 3:49 AM
	Financial Interest Report Opened for Editing					Administrator, System	5/10/2016 2:59 AM
	COI Training Expired					Administrator, System	5/9/2016 8:07 AM
	COI Training Completed						9/13/2012 1:51 PM

# Resources

- [Instructions for using the AIRS](#)
- [How to Edit your Financial Interest Report](#) (video)
- [AIRS How-to Guide](#)

Questions about completing the FIR or about the information presented? Please visit the [COI website](#) or contact the COI in Research Program at [AIRS@vcu.edu](mailto:AIRS@vcu.edu).