


Financial Interest Questions

Financial Interests

1.0 * Officer, Director, and Advisory Board Positions -


In the past 12 months, have you or a member of your immediate family served as an officer, director, or advisory board member: 

Yes

No

[Clear](#)

2.0 * Stocks, Bonds, and Options -


In the past 12 months, have you or a member of your immediate family owned stocks, bonds, or options that you directly control: 

Yes

No

[Clear](#)

3.0 * Outside Professional Activities and/or Travel -


In the past 12 months, have you or a member of your immediate family received remuneration outside of VCU/VCUHS for consulting, other outside professional activities, or travel related to your capacity as a VCU/VCUHS employee: 

Yes

No

[Clear](#)

4.0 * Non-VCU/VCUHS Salary or Other Income -


In the past 12 months, have you or a member of your immediate family received a salary or other income outside of VCU/VCUHS: 

Yes

No

[Clear](#)

5.0 * Business Ownership -


In the past 12 months, have you or a member of your immediate family owned or operated a business: 

Yes

No

[Clear](#)

6.0 * Grants Outside of VCU, Gifts, or In Kind Materials -

In the past 12 months, have you or a member of your immediate family received a grant outside of VCU, a gift, or in kind material to support your role at VCU: 

Yes

No

[Clear](#)

7.0 * Intellectual Property -

Do you or a member of your immediate family own or have an inventive interest in any intellectual property (e.g. inventions, patents, tangible research materials, copyrights, etc.): 

Yes

No

[Clear](#)

Details View

Outside Professional Activities and/or Travel Details

If this section is not applicable, use the "Jump To" menu to go to the - Financial Interests view and update your selections.

1.0 * List the remuneration you or a member of your immediate family has received in the past 12 months for consulting, other outside professional activities, and/or travel related to your capacity as a VCU/VCUHS employee: 

Add													
	Payer Name	Activity Types	Activity Type - Other	Payer Type	Payment Type	Payment Type - Other	Travel Destination	Duration of Travel	Payment Amount \$	Payment Date	Related Interest	Explanation	
Update	American Heart Association	Serving in office or on committee for an academic/professional society or nonprofit organization		Non-Profit Organization	Travel Reimbursement		Dallas	3	400	4/5/2017	no		Delete
					Honorarium				1000	4/5/2017			

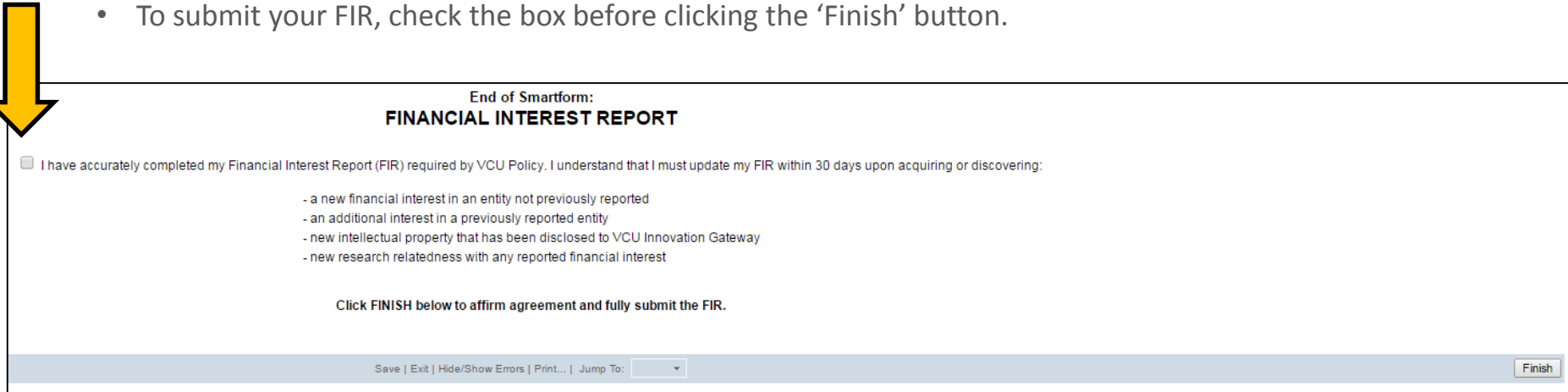
<< Back

Save | Exit | Hide/Show Errors | Print... | Jump To: -- Outside Professional Activities and/or Travel Details --

Continue >>

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:

When is a FIR Reviewed?

- Upon annual update by the investigator
- Prior to protocol approval and/or prior to award processing
 - Review request sent to COI in Research Program for each COI Investigator's FIR to be assessed for COI/CI in the context of the research
 - FIR must be updated within the most recent update period

Reasons an Investigator May be Contacted

- Update of FIR needed within AIRS
- Question regarding:
 - Unreported financial interest in AIRS (based on OPA comparison or other information)
 - Relatedness of a financial interest to the research project being reviewed
 - Details/clarification of a financial interest
 - Use of intellectual property in a research project
- Issued a management plan
- Follow-up on a previously issued management plan
- Non-compliance with a management plan

COI in Research Program Responsibilities

- Review FIR submissions to identify COI/CI
- Develop and implement management plans for COI/CI
- Report FCOI to PHS sponsors, other federal agencies as required, and other sponsors upon request
- Verify with subrecipient institutions the existence of a policy that meets the PHS *Promoting Objectivity in Research* requirements; if none, subrecipients use the VCU AIRS
- Review unreported/unreviewed financial interests and, if necessary, implement a management plan within 60 days
- Upon a determination of non-compliance:
 - The research project and the investigator's activities are retrospectively reviewed within 120 days of the discovery of non-compliance with the VCU *COI in Research* policy to determine if there was bias in the design, conduct, or reporting of research.
 - If bias is found, the PHS sponsor is notified promptly and a mitigation report is submitted.

Summary

- A COI requiring management can arise in situations in which financial or other personal considerations have the potential to compromise or bias professional judgment and objectivity.
- Report all financial interests in the AIRS on an annual basis and within 30 days of acquiring a new financial interest or additional remuneration for a reported interest.
 - Interests should be reported for the last 12 months from the date of the report.
- Preemptive discussion about a foreseen COI is encouraged. Contact AIRS@vcu.edu to begin a conversation with the COI team.

Resources

- [*Responsibility of Applicants for Promoting Objectivity in Research for which Public Health Service Funding is Sought*](#) (or *Promoting Objectivity in Research*) regulations (42 CFR Part 50)
- [*Responsible Prospective Contractors*](#) regulations (45 CFR Part 94)
- [Conflict of Interest](#) – National Science Foundation (NSF) Rules
- [21 CFR 54](#) – FDA regulation for financial disclosure by clinical investigators
- [*State and Local Government Conflict of Interests Act*](#) (Code of Virginia § 2.2-3100 - 2.2-3131)
- VCU [*Institutional Conflicts of Interest in Research – INTERIM*](#) policy
- VCU [*Conflicts of Interest in Research*](#) policy
- VCU [*Guidelines and Procedures for Disclosure, Approval and Reporting of Outside Professional Activities*](#) policy
- VCU Institutional Review Board (IRB) Written Policy and Procedure: [VIII-10 Evaluating Investigator and other Potential Conflicts of Interest](#)
- VCU [COI in Research website](#)

For additional information, [CITI](#) offers a COI mini-course. Log in using your CITI username and password. Add the COI course to your menu.

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.