Annual FIR update in the AIRS

Office of Research Integrity and Ethics
Conflict of Interest in Research Program
Key Definitions

- **Activity and Interest Reporting System (RAMS-AIRS)**
  - The secure management system for reporting interests

- **COI Investigator**
  - A designation determined by the PI that describes any individual who is responsible for the design, conduct, or reporting of research (regardless of their title, role, or position)

- **Financial Interest Report (FIR)**
  - The SmartForm in the AIRS that contains reported interests
Annual FIR Update

• The AIRS opens for the annual FIR update on May 10th of each year.
  – Proposal submissions, protocol approvals, and award dispersals will not move forward until the update has been completed by all COI Investigators.

• On May 10th, the AIRS will send an email to each active reporter once the system is ready for the annual update submission.
  – The following week, the AIRS will start sending email reminder notifications to those who have not yet completed the annual update.
  – NOTE: Emails from the AIRS go to the individual’s @vcu.edu email account (i.e. jdoe@vcu.edu), which cannot be changed. It is recommended that emails from this account be forwarded to a favored one if that is preferred.

• If you received an annual update email from AIRS@vcu.edu, it is because your FIR account is active in the AIRS. If you think this reporting no longer applies to you, email AIRS@vcu.edu to request inactivation.
Reporting Financial Interests

- No changes to make to your FIR?
  - Click *Submit My Annual Disclosure Report* under My Activities.

- Changes to make?
  - Click *Edit Financial Interest Report* under My Financial Interest Report Forms and click the *Add, Update, or Delete* buttons to update your FIR.

- NOTE: If you last completed COI training 3 or more years ago, you will first be directed to a short training module whether or not you have changes to make to your FIR.
Reporting Financial Interests

When to report?

- Annually (beginning May 10th)
- Within 30 days of acquiring:
  - A new interest or an additional interest in a previously reported entity
  - New IP that has been disclosed to VCU Innovation Gateway
  - New research relatedness with any reported interest

What to report?

- Each COI Investigator reports financial and non-financial interests held by themselves and any member of their immediate family in the AIRS.
  - NOTE: Immediate family means the investigator’s spouse and any person who resides in the same household and is a dependent of the investigator.
- Include interests for the last 12 months from the date of the report and their research relatedness, if any, to all proposed or ongoing research

Note: COI Investigators external to VCU who are deferring to VCU’s COI in Research policy must report financial interests, as described herein, except they are to only include interests that are directly related to their work for VCU.
Submitting your FIR

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

End of SmartForm

Check the box below and click Finish on the toolbar to affirm agreement and fully submit your FIR.

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

- a new 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 interest

• Alternatively, you can click Submit My Annual Disclosure Report under My Activities on your FIR workspace.
  – This option will change to Finished Updating My Financial Interest Report if you update your FIR after the annual update is submitted.
Successful FIR Completion

• Once you have successfully submitted your FIR, the Current State converts to Active and the annual update submission will be recorded on the History tab, which can be verified on your FIR workspace.
  – NOTE: The Current State will convert to Open for Edits if you open your FIR for editing after the annual update has been submitted, which has no implications on your annual update status.

• If you have not successfully submitted your annual update, you will continue to receive annual update email notifications.
COI Training

• The Public Health Service (PHS) *Promoting Objectivity in Research* regulations and VCU *COI in Research* policy require COI training for all COI Investigators at least every 4 years. Investigators currently within the 3-4 year time frame will be directed to complete the short training module preceding their annual update.

• Successful training completion will be documented on the FIR workspace.
FAQ

• Why am I getting annual update emails from the AIRS?
  Your FIR account is active in the AIRS and you have not successfully submitted your FIR update. To request inactivation, email AIRS@vcu.edu.

• Why didn’t my FIR submit?
  Follow the numbered instructions in red on your FIR workspace if your FIR was not submitted successfully.

• Why am I getting an error message?
  It is likely due to a missing field. Review the error message at the top of the window and make any necessary corrections. You can also click Hide/Show Errors along the top or bottom toolbar, Jump To the section in question, and resolve any errors found.
Resources

- **AIRS Guidance and Training** – includes the AIRS How-to Guide and related videos

Questions? Visit the [COI in Research](https://www.coiinresearch.org) website or contact the COI in Research Program at [AIRS@vcu.edu](mailto:airs@vcu.edu).