

January 25, 2013

Dear Colleagues,

The Activity and Interests Reporting System (AIRS) for research COI assessment has been on-line for almost five months. During that time we've experienced what might be expected of a new system.

Implementation required all designated 'COI investigators' to enter the AIRS and complete their Financial Interest Report (FIR) for research purposes. Completion of the FIR is necessary in order for the Office of Sponsored Programs to submit an application and for the IRB and IACUC to review a protocol. A 'COI disposition' is made in order to accept funding or for a protocol to be ultimately approved. Now that many investigators have completed their FIR, and since it is not necessary to do so for each submission, many investigators will not need to interact with the AIRS for some time.

However, please be aware that 'COI investigators' are required to update their FIR within 30 days for the following reasons:

- Discovery or acquisition of financial interests with a new entity not previously reported in the FIR.
- Discovery of or acquisition of new or additional interests in a previously reported entity and the financial interests are now >\$5000 in aggregate.
- A new entity not previously reported is reimbursing or paying for travel
- Research-relatedness of existing or new financial interests changes, if applicable.

Updating within 30 days is required by policy (http://www.research.vcu.edu/p_and_g/coi2.htm).

If financial interests are not current and a financial conflict of interests subsequently fails to be identified and managed in a timely manner, there are serious ramifications for both the research project and the institution. Then again, if one of the reasons above doesn't occur, there's no need to go back into the AIRS until the annual update is announced. Recall that the FIR is not protocol- or proposal-specific; rather research relatedness, if any, to an overall research program should be described.

I thank you for your cooperation with the AIRS process. Best wishes on your research.

Best regards,

Francis L. Macrina, PhD
Edward Myers Professor of Dentistry
and Vice President for Research