

From: VP Research/GA/VCU <VPRESEARCH@vcu.edu>  
To:  
Date: 09/26/2012 06:04 AM  
Subject: Research Enterprise - AIRS - COI Update

September 27, 2012

Dear Investigators and Colleagues,

As we conclude our first month of compliance with the PHS Final Rule on "Promoting Objectivity in Research," I would like to take a moment to convey appreciation to the many who have entered the AIRS in order to submit a Financial Interest Report (FIR) and have done so recognizing that our increasingly complex research environment requires evermore effort to foster integrity and transparency. In addition, based on our experience so far I am providing guidance to facilitate the AIRS as well as a status summary of AIRS usage:

- 1) A **"COI Investigator"** is so designated on an IAF or IRB personnel roster by the PI. A COI investigator is responsible for the design, conduct, or reporting of the research and is independent in his or her ability to make decisions relative to the research. The PI is always a COI Investigator, as is a co-PI. In terms of others, even co-investigators, the PI should consider whether such individuals qualify as being independently responsible. Those designated as COI Investigators are a subset of faculty and personnel associated with a proposal or protocol. So far, an average number of COI Investigators on proposals and protocols appears to be 3.
- 2) **Submitting and updating a FIR:** Investigators submitting a FIR in the AIRS should remember that responses must be complete and accurate. An update to your FIR is required within 30 days of acquiring or discovering a new financial interest with an entity not previously reported or when financial interests with a previously reported entity now exceed \$5,000.
- 3) **AIRS entry for protocols:** IRB forms now allow for designation of 'COI investigators,' however the requirement for such individuals to submit their FIR in the AIRS begins 10/1/2012. The IACUC will continue the former paper-based process for Financial Interest Reporting until further notice.

Below, please find a summary of the Activity and Interest Reporting System (AIRS) activity as of the close of business on September 24th.

**AIRS Status**

**Effective compliance date: 8/24/2012**

**End of day 9/24/2012**

**AIRS Status**

**Effective compliance date: 8/24/2012**

**End of day 9/24/2012**

Total FIRs in the AIRS	521
All FIRs – active state (fully submitted)	403
All FIRs – open for edits (not yet submitted)	118
Reviews and disposition by COI office and COIC Chair - primarily for pending/received award	87
# of COI investigators per proposal/protocol – on average	3
# of COI investigators per proposal/protocol – most/ least, so far	11 / 1 – OSP proposal 7 / 1 – IRB protocol

Questions about submitting a FIR into the AIRS can be sent to [AIRS@VCU.edu](mailto:AIRS@VCU.edu). Technical questions can be sent to [eRAhelp@VCU.edu](mailto:eRAhelp@VCU.edu).

Once again, thank you for your continued support of the research enterprise at VCU.

Best regards,  
Frank

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