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

DUE July 1, 2016

Office of Research Integrity and Ethics
Conflicts of Interest in Research Program
AIRS@vcu.edu

Terminology

Activity and Interest Reporting System (AIRS):

 A secure, electronic data entry system for reporting financial interests held by yourself and members of your immediate family

https://airs.research.vcu.edu

Financial Interest Report (FIR):

- The report that contains financial interests held by yourself and members of your immediate family
- The FIR is reviewed in the context of specific research projects to identify conflicts of interest (COI) and the appearance of COI.

Conflicts of Interest (COI) in Research

COIs exist in many forms and frequently are inherent to the nature of the research enterprise. A COI can arise in situations in which financial or other personal considerations have the potential to compromise or bias professional judgment and objectivity.

- Financial or non-financial interests can yield conscious or subconscious bias in the conduct and/or interpretation of research.
- Financial conflicts of interest 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/or managed.
- Unidentified conflicts of interest can be especially problematic in human subjects research if the investigator's objectivity is (or appears to be) compromised.

VCU Policy:

When to update your FIR

On an annual basis

- Due July 1st 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.
- The aggregate for a previously reported financial interest is now over \$5,000.
- There is a change in the 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. This title is designated by the PI on the proposal or protocol.

- Note that when designating an individual as a 'COI Investigator,' independence and responsibility should be comparable/near comparable to that of the PI.
- At a minimum, the 'COI Investigator' is always the PI and the student/trainee investigator of a student project.

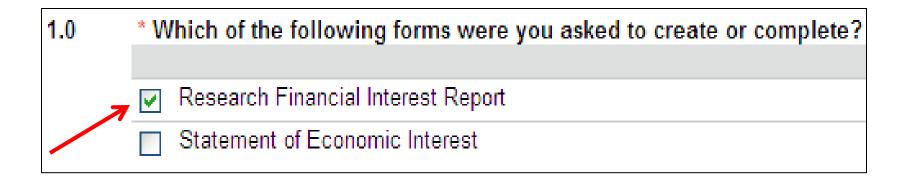
FIR Annual Update Notifications

The annual update period opens on May 10th.

- An annual update notification will be sent from the VPRI to all active investigators.
- An email sent from AIRS will indicate the system is turned ON for the annual update.

Reminder notifications will be sent out weekly from AIRS@vcu.edu to those who have not completed the annual update.

Ensure that the Research FIR box is clicked on the Introduction page

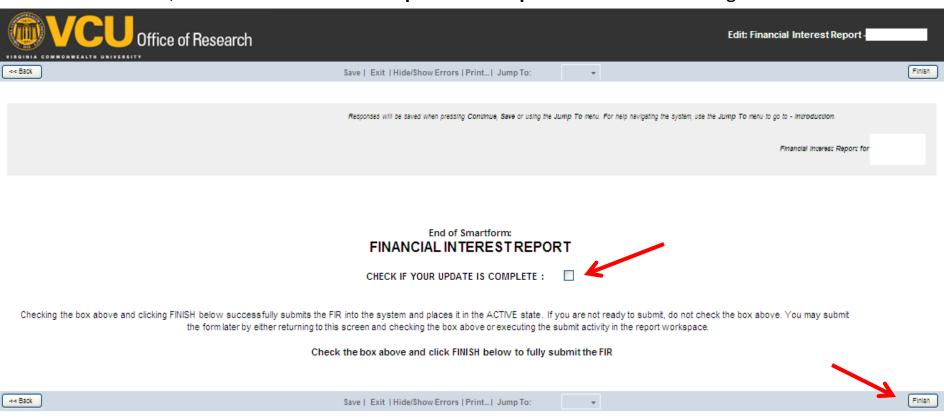


airs.research.vcu.edu

Outside of VCU? First connect to VPN (two-factor authentication required as of 5/5/2016) http://www.ts.vcu.edu/askit/network-services/rams-vpn/

Submitting Your FIR

To submit a FIR, make sure to check the 'Update is Complete' box before clicking the 'Finish' button.



Successful FIR completion

Once you have finished updating your FIR (and checked the 'Complete' box and clicked 'Finish'), the Current State moves to 'Active.'

If the Current State is NOT 'Active', you will continue to receive annual update email notifications.



Training renewal this year

The PHS Final Rule 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.

COI in Research training completion is automatically documented in the investigator's FIR space.

History	Comments	Archive	Documents	Additional Information	Reviews	Management Plans	Snapshot	
	Activity				Author		■ Activity Date	
	Statement of Economic Interest Received				Dempsey, Jaycee L		1/9/2013 2:23 PM	
	Financial Interest Report Updated				Markowitz, Monika S		1/8/2013 11:00 AM	
	Financial Interest Report Opened for Editing				Markowitz, Monika S		12/11/2012 10:06 AM	
	Financial Interest Report Updated				Markowitz, Monika	a S 12/	/11/2012 10:04 AM	
U	Beginning of Statement of Economic Interest Cycle				Administrator, System		12/6/2012 3:17 AM	
	COI Training Compl	leted			Markowitz, Monika	a S 8/2	27/2012 12:12 PM	
36 items				page 4 of 4	D			10 / page

Resources

How to Edit Your Financial Interest Report (video)

https://www.vcu.edu/vcuera/swf/COI%20How%20to%20Edit%20FIR/COI%20How%20to%20Edit%20FIR.htm

AIRS How-to Guide

https://www.vcu.edu/vcuera/airs how to guide.docx

VCU COI website

http://www.research.vcu.edu/coi/index.htm

Questions?

Contact AIRS@vcu.edu