Who is a ‘COI Investigator’ for AIRS reporting purposes?
‘COI Investigator’

- Describes any individual, regardless of title, role, or position, who is responsible for the design, conduct, or reporting of research.

When designating *COI Investigator*, independence and responsibility should be comparable/near comparable to that of the PI. The individual’s role in the project, rather than their title, and the degree of independence with which those individuals work should be primary considerations.

COI Investigators must complete a Financial Interest Report (FIR) in the Activity and Interest Reporting System (AIRS). The AIRS is a secure, electronic data entry system for reporting financial interests, while the FIR is the report that contains these financial interests.
Who is a COI Investigator?

NOTE: not all individuals on a proposal/protocol are COI Investigators

Might be a COI Investigator

- PI on proposal/protocol**
- Co-PI**
- Co- or Sub-Investigators*
- Key/Senior Personnel on proposal*
- Project manager/director*
- Student (usually graduate or trainee) who is ‘functional’ PI on protocol*
- Medical investigator*
- Research staff authorized to make independent decisions without PI consultation*
- Consultant who will make decisions about design, conduct, or analysis/reporting*

** always      * very likely

Probably not a COI Investigator

- Students under the direct supervision of PI/Co-PI/Co- or Sub-Investigator
- Research staff, including engaged community members, under direct supervision (i.e. they must consult with PI, have no/limited independent decision making authority)
- Research-related personnel whose jobs support the research enterprise (e.g. investigational pharmacists, lab technicians, CRSU staff)
- Anyone other than the PI on a training, practice, or resource grant
VCU ‘COI in Research’ Policy

The VCU ‘COI in Research’ policy applies to COI Investigators on all research, including research that is:

- Funded by PHS (NIH)
- Funded by a non-NIH federal entity
- Funded by a state agency
- Funded by industry/business
- Funded by any non-profit entity
- Not funded at all

The policy also applies to NIH and other funded research for which VCU is a subrecipient as well as adherent subrecipient institutions.
Subrecipients

**OSP**

- At a minimum, PIs at subaward institutions are COI Investigators.
- Prior to submission of a PHS-sponsored proposal (or a sponsor who is adherent with the PHS Final Rule), the subrecipient completes the [VCU Subrecipient Commitment Form](#).

OSP will verify with subrecipient institutions whether the VCU ‘COI in Research’ Policy or the financial COI policy of the subrecipient institution will apply to its investigators who are collaborating with VCU investigators.
Non-VCU Collaborators

ORSP

• Designation of COI Investigator for non-VCU affiliates depends on whether the level of responsibility and independence is near comparable to the PI.
  – For example, engaged community members recruiting or surveying participants are accountable to the PI and as such are likely not COI Investigators.
  – However, an investigator at a collaborating institution with responsibilities comparable to the VCU PI is likely a COI investigator.
What do PIs need to do?

• Determine if personnel listed on grant proposals or IRB/IACUC protocols qualify as COI investigators

• Notify all designated COI investigators on the pending proposal/protocol submission to ensure their FIRs are current (updated on an annual basis by July 1\textsuperscript{st} and within 30 days of acquiring a financial interest)

• Work with OSP and ORSP regarding subrecipients and non-VCU collaborators
Designating COI investigator in RAMS Systems

OSP uses RAMS-SPOT, a database and electronic submission and review system.

Note that the PI is always a COI Investigator. Personnel added to the study must be designated as COI Investigators, as appropriate.
Designating *COI investigator* in RAMS Systems
Designating *COI investigator* in RAMS Systems

ORSP uses **RAMS-IRB**, a database and electronic submission and review system.
Designating COI investigator in RAMS Systems

**Personnel**

1. *Name:*

2. *Is this individual a 'COI Investigator'?*
   - Yes
   - No
   - Clear

3. *Roles:*
   - Principal Investigator
   - Co/Sub-investigator
   - Medical or Psychological Responsible Investigator
   - Research Coordinator
   - Research Nurse
   - Consultant
   - Research Assistant
   - Pharmacist
   - Statistician
   - Regulatory Coordinator
   - Trainee/Student
   - Other

**Personnel - Non-VCU**

1. *Name:*

2. *Name of Non VCU Institution:*

3. *Affiliation:*
   - Non-VCU Affiliate / No Authorization Agreement needed
   - Non-VCU Affiliate / Authorization Agreement needed
   - Independent Investigator / No Independent Investigator Agreement needed
   - Independent Investigator / Individual Investigator Agreement needed
     - Clear

4. *Is this individual a 'COI Investigator'?*
   - Yes
   - No
   - Clear

5. *Indicate whose COI policy this individual will follow:*
   - VCU COI Policy
   - Non-VCU Affiliate’s Institutional Policy
     - Clear
Each COI Investigator reports financial interests held by him or herself or any member of his or her immediate family (spouse and any child residing in the same household as the Investigator who is a dependent of the Investigator).

**When and what to report?**
- Initially and annually by July 1\(^{st}\) (notification email will be sent out)
- Include financial interests for the last 12 months and their research relatedness, if any, to all proposed or ongoing research

**When to update?**
- Within 30 days of discovery/acquisition of a new financial interest OR same financial interest whose aggregate is now >$5,000
- May need to update research relatedness for new proposal/protocol based on existing financial interests
Training Renewal

The PHS Final Rule (‘Promoting Objectivity in Research’) 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.
Related Documents and Resources

Instructions for using the AIRS

‘Conflict of Interests in Research’ training slides

VCU 'Conflict of Interests in Research' policy


To access AIRS, RAMS-SPOT, or RAMS-IRB, visit the RAMS & VCUeRA Systems page.

For technical help with the RAMS Systems, contact eRAHELP@vcu.edu.

For instructions on how to access VCU VPN, visit the VCU Technology Services RamsVPN page.

For help accessing VCU VCPN, contact itsc@vcu.edu.
Questions about completing the FIR or about the information presented? Please contact the COI Program at AIRS@vcu.edu or visit the COI website.