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
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:
http://www.policy.vcu.edu/sites/default/files/Conflict%20of%20Interests%20in%20Research.pdf
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 10\textsuperscript{th}**.

- 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.

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<th>1.0</th>
<th>* Which of the following forms were you asked to create or complete?</th>
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<tbody>
<tr>
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<td><strong>Research Financial Interest Report</strong></td>
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<td><strong>Statement of Economic Interest</strong></td>
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[airs.research.vcu.edu](airs.research.vcu.edu)

Outside of VCU? First connect to VPN
(two-factor authentication required as of 5/5/2016)

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