UT RESEARCH MANAGEMENT SUITE

COI Module Frequently Asked Questions

General

All Investigators and researchers who are Covered Individuals must disclose Significant Financial Interests (SFI) and other outside activities as defined by HOP 7-1210, “Promoting Objectivity in Research by Managing, Reducing, or Eliminating Conflicts of Interest.” A Covered Individual is a researcher who has the authority to make independent decisions related to the design, conduct, or reporting of University Research.

UT faculty and professional research staff are required to complete or Update their Disclosure Profile in UT Research Management Suite COI Module (UTRMS-COI).

1. When am I required to complete/update my Disclosure Profile in UTRMS-COI?

The system will send email invitations to individuals when disclosure is required. An update to the Disclosure Profile is not possible without an invitation. Read more about when notifications are sent.

Notifications will be sent by email with a link to the UTRMS-COI module when disclosure is required:

within 30 days of initial employment (PI eligible faculty/staff only),

prior to the submission of a PHS application for funding,

when identified as a covered individual on an IRB proposal,

when identified as a FCOI investigator on a research award, and

at least annually.

Users are responsible for updating their Disclosure Profile within 30 days of acquisition of a new activity requiring disclosure.

Instructions for completing/updating the Disclosure Profile can be found in the COI User Guide on the Resources and FAQs page under “COI”.

2. What is a Disclosure Profile?

Your Disclosure Profile is a living record of your current financial interests and outside activities. (This replaces the previous “FID form” in eProtocol.)

3. I filled out a FID form in eProtocol, why am I being asked to enter information in UTRMS-COI?

Transition to UTRMS-COI from eProtocol is taking place over a one-year period (beginning June 27, 2022). Your FID form remains on file as the current disclosure until you are notified to

update your disclosure profile either because you are added to a research project or your current FID form has expired (whichever is first).

4. What is a pre-approval request?

The pre-approval request is the process by which faculty and professional staff request prior approval for activities outside of their UT employment.

The Outside Activities office reviews pre-approval requests and annual disclosures, coordinating with departmental supervisors as needed to manage situations that may compromise an employee's ability to appropriately fulfill institutional responsibilities.

Read below for more information on the types of activities that require pre-approval.

5. When should I submit a pre-approval request?

UT faculty and professional staff have a primary commitment to the University and have an obligation to request prior approval for outside activities in order to:

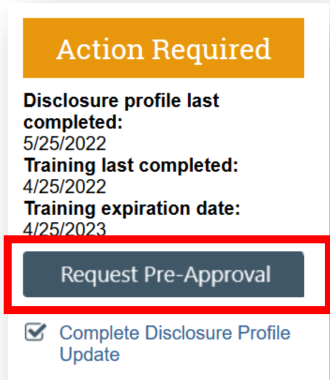
- Disclose and obtain approval for permissible outside activities and interests.
- Implement strategies for conflict of commitment management when necessary, in order to ensure obligations to the university can be maintained in alignment with UT System and University policy.
- Avoid or discontinue outside activities that cannot be adequately managed.

HOP 5-2011, "Conflicts of Interest, Conflicts of Commitment, and Outside Activities" requires all faculty and professional staff to request prior approval for outside activities, with some exceptions for pre-approved activities, and complete or update the disclosure of financial interests and outside activities at least annually, even if no activities are reported.

Activities requiring disclosure include:

- Outside consulting or other outside employment related to professional area of expertise
- Outside academic appointments such as visiting, honorary, emeritus, and affiliate positions
- Board / Leadership positions
- Professional services such as editorial service or clinical service
- Educational services such as presenting or creating educational material for continuing education
- Expert witness / Legal consulting

To begin the pre-approval process, click the blue *Request Pre-Approval* button on your disclosure profile and answer the questions. You should submit on request per activity.



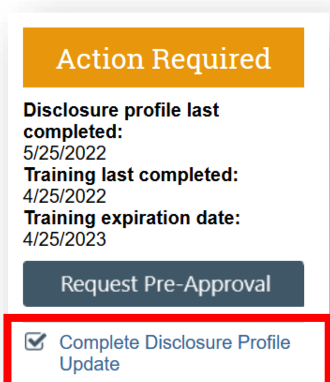
6. What is the COI Review Process?

The Outside Activities office reviews proposed research activities (at time of award and/or time of IRB protocol submission) and communicates with the investigator, as necessary, to determine if there is a disclosed financial interest that presents a conflict of interest with the investigator's research activities. This process may involve the Objectivity in Research Committee for complex conflict situations. When potential or perceived financial conflict(s) of interest are identified, the COI team works with the investigator to manage the conflict of interest.

Pre-approval requests are reviewed by the Outside Activities office and routed to departmental supervisors for review as necessary.

7. What do I do if I have "action required" but have finished my profile?

If the orange box in the upper left-hand corner of your disclosure profile says "Action Required", check the Instruction Center located in the top-middle of the page for instructions on how to complete the required action. To submit your profile update, click the *Complete Disclosure Profile Update* link.



8. How can I check the COI status of the proposal or award personnel?

Click *COI Disclosure Status* on the left-side menu of the FP or AWD to see the real-time COI status for all personnel. Detailed instructions for viewing and interpreting COI status on Grants records can be found in the guidance document "How to Check COI Status" on the Resources and FAQs page under "COI".

9. How can I check the COI status of my study team (for IRB studies)?

Click the *COI* tab on the study record after it has been submitted to the IRB to see the real-time COI status for all personnel. Detailed instructions for viewing and interpreting COI status on IRB studies can be found in the guidance document "How to Check COI Status" on the Resources and FAQs page under "COI".

10. Where can I find more information on disclosure requirements and the associated UT Policies?

For more information, visit the COI website.