1. **How do I access the Conflict of Interest Disclosure and Management System (COI System)?**

   The disclosure system can be accessed at: [https://secure.research.vt.edu/coi](https://secure.research.vt.edu/coi). You will be required to login using your PID/Password.

2. **How do I access instructions on how to use the COI System?**

   You will find instructions on how to use the system on the “Get Help” page of the COI System as well as on the Conflict of Interest website [http://www.research.vt.edu/conflict-of-interest/](http://www.research.vt.edu/conflict-of-interest/).

3. **How do I start an application?**

   You will need to log into the COI System at [https://secure.research.vt.edu/coi](https://secure.research.vt.edu/coi). To start a new disclosure click on “Start a new disclosure”.

4. **Who must complete a disclosure?**

   Any university employee (or employed student) with a financial or managerial interest (such as income, royalties, consulting, equity ownership, or service as member of the board of directors or company officer) in an external entity must disclose that interest when it meets certain defined thresholds. Additionally, all employees must report additional/outside employment and consulting. The requirement for disclosure also applies to such interests of the employee’s immediate family members.

   Below are links that provide additional guidance on activities that generally do/do not require disclosure.

   - [External Activities that Require Advance Approval](http://www.research.vt.edu/conflict-of-interest/activities-that-require-advance-approval)
   - [External Activities that Generally Require Advance Approval](http://www.research.vt.edu/conflict-of-interest/activities-that-require-advance-approval)
   - [External Activities that Generally Do Not Require Disclosure](http://www.research.vt.edu/conflict-of-interest/activities-that-donot-require-disclosure)

   Questions may also be directed to the mailbox at coiadmin@vt.edu or contact the COI Office [http://www.research.vt.edu/conflict-of-interest/contacts](http://www.research.vt.edu/conflict-of-interest/contacts). You can also find a list of activities that generally require disclosure on our website at [http://www.research.vt.edu/conflict-of-interest/](http://www.research.vt.edu/conflict-of-interest/) under the “Disclosure” menu. You can also use the online disclosure decision tree.
5. **Can someone log in and make my disclosures for me?**

No, employees that need to disclose an outside activity or interest should submit their own disclosure(s). Due to the personal nature of the questions, the named individual on the disclosure must complete the disclosure and not a designee.

6. **Can I share my username and password with someone else?**

Your username and password are assigned to you, and per policy cannot be shared with others. You will be held responsible for use of the system under your username and password by another person. Never share your password.

7. **Where can I find training on the Conflict of Interest and Commitment Policy?**

There are several ways to complete COI training.


2) Synchronous online training will be held monthly throughout the academic year. You can register for these sessions at [www.training.vt.edu](http://www.training.vt.edu), select View By Category, Office of the VP for Research, OVPRI: Individual Conflicts of Interest & Commitment, then select the date you wish to participate.

3) At any time you can request a training session for faculty/staff meetings or any event. Please contact the COI Office [http://www.research.vt.edu/conflict-of-interest/contacts](http://www.research.vt.edu/conflict-of-interest/contacts).

8. **How often do I need to complete a disclosure?**

The COI Office will issue an annual call to employees in the fall semester. All employees with reportable outside activities and interests should disclose any current or anticipated outside activities for the upcoming fiscal year at that time. A newly acquired outside activity or financial interest that might occur through events such as marriage, inheritance, or establishment of a new company, must be disclosed within **30 days**.

All additional/outside employment and consulting activities require approval in advance. Below is a timetable of when applicable disclosures are due.

- **Annual Disclosures are required by each employee for applicable external activities.**
  
  Disclosures are filed on a fiscal year basis July 1st-June 30th.
Disclosure Renewal:
External activities planned for multiple fiscal years will require a renewal submission each fiscal year for review and approval considerations.

If Your Personal Situation Changes:
A newly acquired outside activity or financial interest that might occur through events such as marriage, inheritance, or establishment of a new company, must be disclosed within 30 days.

Research (Sponsored Projects) At Time of Proposal Application:
This requirement is in addition to the annual disclosure above. Each Investigator, including subrecipient Investigators and consultants, if applicable, planning to participate in sponsored research must have an approved disclosure on file at the time of application (Public Health Service). The proposal approval form conflict of interest questions will serve as the initial disclosure. Additional disclosures may be required upon review.

9. Can I complete more than one disclosure during the fiscal year?

Yes, it is not unusual for employees to submit multiple disclosures throughout the fiscal year.

10. Am I required to complete a disclosure if I do not have an activity or financial interest to disclose?

No, you are not required to submit a disclosure application if you do not have an outside activity or financial interest that requires disclosure. Each employee is responsible for disclosing applicable activities or interests as outlined in Policy 13010 Individual Conflicts of Interest and Commitment. If you need further guidance you can contact our office at http://www.research.vt.edu/conflict-of-interest/contacts.

11. Who determines whether a conflict exists?

All Virginia Tech employees must be committed to conducting themselves in accordance with the highest standards of integrity and ethics. All employees should be familiar with their responsibilities for disclosing outside activities and interests. Policy 13010: Individual Conflicts of Interest and Commitment provides policy and procedural guidance for disclosure and approval of employee involvement with external activities. Policy 13010 must be read in conjunction with additional guidance on consulting and conflicts of interest and commitment in the Faculty Handbook, related policies such as intellectual property, facilities usage, outside/additional employment for staff, procurement standards of conduct and ethics, and state and federal statutes and regulations.

You must disclose outside activities or interests that requires disclosure per the above policies. If you think that you may have a conflict, but are not sure you can contact the
12. **What happens when I report that a conflict of interest exists?**

You should complete a disclosure through the COI System. Please provide sufficient detail of the activity and/or nature of the relationship so that reviewers/approvers can adequately evaluate the relationship.

The disclosure application will be reviewed by the appropriate administrator and by the COI Office. All disclosures will require a department level, college level, and COI Officer approval. If further information or clarifications are needed, an administrator will contact you through the system or directly. Administrators will provide guidance on the development of a management plan if a plan is needed or required.

13. **What is a reviewer and what is their role?**

A reviewer is a person in your department or unit that has been assigned to initially review all disclosure applications from the department/unit. This individual will not approve your disclosure application, but will review for completeness. The reviewer may ask for clarifications or revisions. Once the reviewer is satisfied with the disclosure application, he/she will forward to the next reviewer and approver.

14. **What does it mean if you are a reviewer and approver?**

An individual that can review AND approve disclosure applications will normally be the department head/institute director and the associate deans for research. This individual will approve the activity or disclosure application. Upon approval, the disclosure application will then be forwarded to the COI Office for final approval.

15. **Whom should I select as my reviewer?**

After you have completed a disclosure application, you will have an opportunity to select the department level or college level approver as appropriate. The system will provide a list of possible reviewers in your department/unit. If you do not see the correct reviewer named, you can select “other” and search for the correct reviewer using their PID. To determine the correct approver to select, please talk with your supervisor.

16. **What if I selected the wrong reviewer or reviewer and approver and need to change it?**

Once you have submitted your disclosure application, it will be sent to the COI Office for pre-review. You can contact the COI Office to change the reviewer/approver. If the COI Office determines that the incorrect individual was selected, an administrator will change the reviewer and forward the disclosure application to the correct individual.
17. How do I know if my disclosure has been approved?

At any time during the process, you can log into the COI System and check the status of your disclosure application. Upon final approval, you will receive an email informing you that your disclosure application was approved. Please keep in mind that during the review and approval process an administrator may seek clarification or revisions of your disclosure application. This may be done through the COI System or directly.

18. What is a management plan?

A management plan is required whenever there is a potential for a conflict of interest of commitment, or the perception of such a conflict. A management plan will outline strategies for mitigating the risk posed by the conflict. The COI Office recommends that you send the management plan for pre-review prior to obtaining signatures. The COI Office can provide input regarding the required and recommended mitigation strategies.

19. What happens if an administrator determines that my conflict of interest needs a management plan?

If a reviewer or approver determines that a management plan is needed they will contact you through the COI System or directly. You can attach management plans to the disclosure application or you can submit an amendment after your disclosure application has been approved.

20. What if my outside activity or interests extend beyond the current fiscal year?

Employees are required to disclose all applicable outside activities or interests on an annual basis. The reporting period is from July 1-June 30th each year. If your activity or interest extends beyond the fiscal year you will be required to renew your disclosure application in the system. You will receive an email reminder approximately 30 days before the disclosure application is set to expire. You will need to log into the system and either renew or close the disclosure application.

21. What happens when a disclosure is returned to me from a reviewer and approver?

You will receive an email notification if a reviewer or approver requests revisions or clarifications. The email will provide a direct link to the disclosure application in question. You will need to review the comments and make any necessary changes. Once the revisions or clarifications are resolved you will need to resubmit the disclosure application.

22. What is my role as an administrator, researcher, or other employee that has approved or is aware that a management plan is in place to mitigate a conflict?

All individuals working under a management plan should follow the management plan at all times. The COI Office will follow up periodically with those responsible for ensuring the management plan is followed to confirm that the management strategies in place
are effectively mitigating the conflict. If the conflict is resolved or any changes are required to the management plan, the appropriate administrators should contact the COI Office immediately.

23. **Can I edit my disclosure application after submission?**

Changes to the disclosure application are generally not allowed during the review process. If you need to make changes to your application while it is in the pending stage please contact the COI Office for assistance. After the disclosure application reaches final approval, you will be able to submit an amendment by going to “My Disclosures” and selecting “Start Amendment Application” alongside of the disclosure application you would like to edit. After all changes are made the disclosure application will be re-routed for approvals.

24. **Can I cancel a disclosure application?**

If you started a disclosure application and it was later determined that you did not have to disclose the outside activity or interest you can log into the COI System, select the disclosure in question, and choose cancel.

25. **Whom should I contact to answer any question that I might have about this process?**

Questions may also be directed to the mailbox at coiadmin@vt.edu or contact the COI Office [http://www.research.vt.edu/conflict-of-interest/contacts](http://www.research.vt.edu/conflict-of-interest/contacts).