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. **Can an employee log in and complete a disclosure for someone else?**

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

4. **Can employees share their 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.

5. **What is Virginia Tech’s policy on conflict of interest?**

   All approvers should be familiar with Virginia Tech’s employees’ 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.

6. **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, 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.

7. **What is a Reviewer and what is their role?**

A reviewer is an individual that has been assigned to initially review all disclosure applications from the department/unit or college level. 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 approver. This step is not required, but some areas prefer to have a designated individual to initially receive all disclosure applications.

8. **What does it mean if you are an 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, disapprove, or request revisions. To approve the disclosure application, the approver will be required to complete certification(s). The approver is also responsible for ensuring a management plan is followed during the year, if one has been designed for the employee. Upon approval, the disclosure application will then be forwarded to the COI Office for final approval.

9. **What is the role of an approver?**

An approver must:

- review the disclosure application for completeness and compliance with applicable university policies,
- request revisions of the applicant if changes or clarifications are needed,
- determine if the outside activity or interest requires a management plan-if a management plan is needed contact the COI Office for further guidance,
- determine if the disclosure application should be approved or disapproved, and
- provide certifications as requested in the COI System.

10. **As an approver, how do I know when there is a disclosure application to review?**

The COI System will send an email informing you of a disclosure application that requires review and approval. The email will contact a direct link to the disclosure that requires review/approval.
11. **What is difference between a reviewer and an approver?**

The reviewer will review the disclosure and if there are no concerns will forward to the approver. The reviewer does not approve the disclosure. The approver will also be required to complete certifications prior to approving a disclosure application.

12. **What does the symbol 🟢 mean?**

Flags 🟢 indicate potential areas of concern. As an approver, you will need to review the entire disclosure application and take note of any red flags.

13. **What does the “Total Activity Days” mean?**

The COI System will provide you with the total number of activity days across all disclosure applications for the employee. If there is a large number of days committed to outside activities you will see a red flag 🟢. Please review for potential conflicts of interest and commitment issues. You will be asked to certify that you have reviewed the total number of days devoted to outside activities if the number of days reaches a certain threshold.

14. **What are certifications?**

As an approver, you have additional responsibilities for ensuring that the requested outside activity or interest is in compliance with all applicable policies and will not cause a detriment, or harm, to the university.

15. **What if the 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 the activity or interest extends beyond the fiscal year employees are required to renew their disclosure application in the system. They will receive an email reminder approximately 30 days before the disclosure application is set to expire. They will need to log into the system and either renew or close the disclosure application.

16. **Who can send revision requests to the applicant/discloser?**

All individuals that are designated reviewers or approvers can request revisions of the disclosure applications. The applicant 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. They need to review the comments and make any necessary changes. Once the revisions or clarifications are resolved the applicant will resubmit the disclosure application for your approval.
17. **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.

18. **What happens if I think there is a conflict of interest that may require a management plan?**

You can contact the COI Office to seek guidance on any potential conflicts of interest.

If you determine that a management plan is needed you can contact the applicant directly or request a revision through the COI System that the discloser/applicant must attach a management plan to the disclosure application.

If you are a college level approver you may reach out to the department level approver directly. 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.

19. **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.

20. **How do I move the disclosure application forward to the next individual?**

**Reviewer Only**

This “send to” option is only completed if you are only responsible for reviewing the disclosure. Approvers should select the “Approve” option.

At the bottom of the Once you are ready to move the disclosure application to the approver, you will need to select “Send To” from the reviewer actions at the bottom of the page. A box will appear with recommended names based on your organization. If you do not see the correct individuals listed, you will need to select “Other” then search by name, email, PID or 9-number and select the appropriate individual. Then select send to forward the disclosure application to the approver. The approver will receive an email notifying them that a disclosure application is waiting for their approval.
Approver

There are generally three approval levels for a disclosure application; a department level, college level, and COI Officer level.

- **Department Level**-If you are the department level approver you will need to send the disclosure application to the appropriate individual at the college level. You will need to select “Approve” from the reviewer actions ribbon at the bottom of the screen.

  Step 1: Complete all certifications. If mitigation is required, you can add them to the open text box available. Please note that some conflicts require a management plan as outlined on the COI Office website.

  Step 2: A box will appear with a list of suggested individuals at the college level. You will need to select the name and click send. If you do not see the correct individuals listed, you will need to select “Other” then search by name, email, PID or 9-number and select the appropriate individual. Then select send to forward the disclosure application to the approver. The approver will receive an email notifying them that a disclosure application is waiting for their approval.

- **College Level**-If you are the college level approver you will need to send the disclosure application to the COI Office for final approval. You will need to select “Approve” from the reviewer actions ribbon at the bottom of the screen.

  Step 1: Complete all certifications. If mitigation is required, you can add them to the open text box available. Please note that some conflicts require a management plan as outlined on the COI Office website.

  Step 2: A box will appear, select “COI Office”. Then select send to forward the disclosure application to the COI Office.

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

    You can contact the COI Office to change the reviewer/approver.

22. **How do I know if a disclosure that I approved reached final approval?**

    Only the disclosure/applicant will receive an email once the disclosure application reaches final approval. You can log into the COI System at any time and view all disclosures for your organization by click on “Your Org./Dept. Disclosure(s)”. You can search by name or entity in the quick search or you can sort by column title.
23. **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).