



## Novelution Financial Conflict of Interest Guidebook

### **Financial Conflict of Interest Introduction**

Novelution's robust Financial Conflict of Interest (FCOI) module provides seamless electronic disclosure and management for both annual "Significant Financial Interest" (SFI) and "Project-Specific Disclosures". All disclosures will now be submitted, reviewed, managed, and approved electronically and will be centrally housed within Novelution. Given the robust features of the FCOI module, this guide will assist users in becoming familiar and understanding the purpose of each function and how to submit and manage disclosures.

### **"Significant Financial Interest" (SFI)**

The "Significant Financial Interest" (SFI) submission replaces what is currently Section 1 of the Significant Financial Interest disclosure form. This is where researchers will generally answer whether they have any financial interests in the form of activities in an external company, equity interest, intellectual property, or travel. This is also the place where researchers will provide detailed descriptions about their outside companies. This can be thought of as your FCOI user profile and will only need to be submitted once and updated annually or when a researcher becomes involved in a new external activity.

### **"Project-Specific Disclosures"**

The Project-Specific Disclosure submission replaces what is currently Section 2 of the Significant Financial Interest disclosure form. Researchers will complete this section for each new research project that has been awarded to answer questions about how the current project specifically relates or does not relate to the researcher's external financial activities which were previously disclosed.

### **Key Benefits**

The FCOI module was created with the intent to provide seamless disclosures, management, and transparency while reducing unnecessary burden for Researchers, Administrators, Approvers, and the FCOI Committee Members. Since all disclosures will be submitted and managed electronically, it eliminates the traditional "paper" or "PDF" disclosure form, meaning the paper or PDF disclosure form will no longer have to be downloaded, completed, physically signed by researcher and any other approver(s), emailed, or uploaded into each proposal file. Additionally, the annual SFI is now only completed once and shall be valid for twelve (12) calendar months, unless there has been a change regarding the annual SFI. This now eliminates the need to have to complete the annual SFI for each and every proposal as in the past. A Researcher can complete or update/renew the annual SFI at any time and the annual SFI shall cover all proposals submitted within the twelve (12) calendar month when the Annual SFI was completed or updated/renewed. When an Annual SFI is updated/renewed, the validation period starts over (extended for another twelve calendar months) from the updated/renewed date.

For "Project-Specific" disclosure, Novelution will automatically notify and create a task for the researcher at "Award" stage if there is project-specific disclosure to be completed and managed. The researcher will

then complete the requirements for the project-specific disclosure and then route for signatures/FCOI Committee review/approval/management plan.

### **Key Benefits Summary**

- Eliminates the “paper” or “PDF” disclosure form
- Annual SFI is completed once and is valid for twelve (12) calendar months
- If an Annual SFI is current, the researcher does not have to submit an Annual SFI disclosure for each proposal, unless there has been a change to the Annual SFI
- The Annual SFI can be completed or updated/renewed at any time. Upon updating/renewing, the twelve (12) calendar month validation period is extended and starts over
- System generated notification/tasks for “Project-Specific” disclosures
- Electronic routing and approval for “Project-Specific” disclosures, including review, approval, and management plans

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## **Definitions**

### **Annual Disclosures**

Annual, significant financial interest (SFI) disclosure(s) shall be completed electronically via Novelution.

### **Project-Specific Disclosures**

Only occurs if there is a financial conflict of interest disclosure in the Annual SFI in Novelution and the proposal has been awarded.

### **Ad Hoc Disclosures**

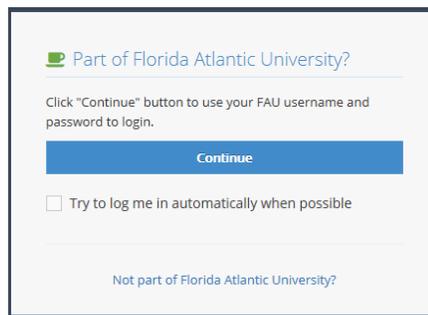
Within thirty (30) days of joining a research project already in progress or within 30 days of acquiring a new Annual SFI. The Annual SFI in Novelution should be updated/renewed and then submitted.

### **Travel Disclosures**

Within Thirty (30) days of any reimbursed or sponsored travel undertaken by the Researcher rated to their Institutional Responsibilities (over \$5,000).

## **Login to Novelution**

- Sign in at [fau.novelution.com](http://fau.novelution.com)
- Click "Continue" to use your FAU Single Sign-On (SSO) username and password.
- You will be taken to your institutional log-in page.



## Novelution Home Page (All My Tasks)

Upon successfully signing in Novelution, the landing/home page automatically defaults to the user's "All My Tasks" view under the "Profile & Settings" tab. In order to access the FCOI module, the user must move their mouse cursor and hover over the "FCOI" tab.

The screenshot shows the Florida Atlantic University Novelution Research Management System interface. The top navigation bar includes tabs for Profile & Settings, Site Admin, IRB Module, IACUC Module, Grants & Contracts, Radiation Safety, and FCOI. The FCOI tab is circled in red. Below the navigation bar, the page title is "All My Tasks". A filter search section is visible, followed by a table of tasks. The table has columns for Type, Action, Message, Due Date, and Task Created. The tasks listed include COI, Sponsored Research, and Subaward.

| Type               | Action                         | Message   | Due Date                         | Task Created        |
|--------------------|--------------------------------|---|----------------------------------|---------------------|
| COI                | Relatedness/Project questions  | You have been identified on project "SFI and Project Specific Disclosure". Please complete a project-specific disclosure. |                                  | 05/14/2021 3:54 PM  |
| COI                | Relatedness/Project questions  | You have been identified on project "SFI and Project Specific Disclosure". Please complete a project-specific disclosure. |                                  | 05/13/2021 5:04 PM  |
| Sponsored Research | Update                         | FOA sponsor doesn't exist, needs to be mapped for 'U.S. Mission to Lesotho'   |                                  | 03/05/2021 1:48 PM  |
| Subaward           | Update                         | Fill out subaward information   | 03/07/2021 3:56 AM (-108) Urgent | 03/05/2021 8:56 AM  |
| Sponsored Research | Approve/Modifications required | Proposal record 000361 submitted by PI P13 DemoUser entitled "" has been routed and pending PCA approval.                 |                                  | 02/18/2021 3:14 PM  |
| Sponsored Research | Update                         | COI annual disclosure and approval to disclose salary   |                                  | 10/30/2020 12:19 PM |

When the cursor is hovering the FCOI tab, additional sub-sections will appear, including:

1. My FCOI Disclosure
2. Search FCOI Disclosures
3. Search Project-specific Disclosures
4. Search Management Plans
5. Ad-hoc Reports

The screenshot shows the Florida Atlantic University Novelution Research Management System interface. The top navigation bar includes tabs for Profile & Settings, Site Admin, IRB Module, IACUC Module, Grants & Contracts, Radiation Safety, and FCOI. The FCOI tab is highlighted, and a dropdown menu is open, showing sub-sections: My FCOI Disclosure, Search FCOI Disclosures, Search Project-specific Disclosures, Search Management Plans, and Ad-hoc Reports. The rest of the page content is the same as in the previous screenshot.

## Annual Significant Financial Interest (Defining Each Sub-section)

1. **My FCOI Disclosure** – The “My FCOI Disclosure” panel allows users to disclose their “annual” significant financial interest (SFI) through a series of four (4) defined questions. This is a unique section with its own “Panel shortcuts” menu on the upper left-hand side for ease of navigation. A user can click on the specific section of interest or scroll down on the page to reach the intended section. When answering the four (4) defined questions, the user will select “Yes or No” utilizing radio buttons. If the selection is “No”, the user can proceed to the next question.

The screenshot shows a web application interface for editing a Financial Conflict of Interest (FCOI) disclosure. At the top, there is a navigation bar with tabs for Profile & Settings, Site Admin, IRB Module, IACUC Module, Grants & Contracts, Radiation Safety, and FCOI. Below this is a breadcrumb trail: Home > FCOI > Edit FCOI Disclosure. The main content area is titled "Edit - Disclosure for Tracy Vuong" and contains the following elements:

- A "Panel shortcuts" sidebar on the left with a "collapse all | expand all" link and a list of menu items: Review Comments, To-Do, Financial Interest/Activity, Financial Equity Interest, Intellectual Property, Travel, Additional Information, Admin, Attestation, Workflow and Requirements.
- A "Request amendment" button.
- A "Review Comments" section with an "Add Comment" button.
- A "To-Do" section.
- A "Financial Interest/Activity" section with a question: "In the past twelve (12) months have you, your spouse, or dependent children engaged in an activity with any entity resulting/involving financial interests which could reasonably appear to affect or be affected by your areas of Research in which you or they:" followed by a bulleted list of conditions and "Yes" and "No" radio button options. The "No" option is selected.
- A "Financial Equity Interest" section with a question: "Do you, your spouse, or dependent children have an Equity Interest valued over \$5,000 in a publicly-traded or any equity in a non-publicly traded entity involving financial interests which could reasonably appear to affect or be affected by your areas of research, including but not limited to shares of stock or stock options within the prior 12 months?" followed by a note: "DO NOT include equity held in a mutual, pension, or investment fund over which you have no control with regard to investment decisions.\*" and "Yes" and "No" radio button options. The "No" option is selected.

2. **If the selection is “Yes”** - Additional action is required and an “Add” button will appear either to add activity, add financial Equity Interest, add intellectual property, and/or add travel. Depending on which question(s) were answered “Yes”, once the “Add” button is clicked, a pop-up will appear with additional questions pertaining to that specific disclosure. The four (4) defined questions pertain to the following areas:

## Financial Interest/Activity

Activity ✕

Reporting for\*  
 Self  
 Spouse  
 Dependent Child

Entity's Name\*  
Start typing...

Type of Activity\*  
Select one

Start date of your involvement with this entity\*

What is the current status of this involvement?\*

Ongoing  Completed

Describe your, your spouse's, or dependent child's relationship/role/duties or responsibilities in this company or entity\*

Will the entity involve the use of the university's or school's facilities or resources?\*

Yes  No

Are any other university personnel involved with this entity?\*

Yes  No

Was this Activity compensated?\*

Yes  No

Provide any other information relevant for it to be determined whether your financial interests/activities create an actual, potential or perceived Financial Conflict of Interest. Note: The more details you provide the more expeditious the process will be as additional follow up is less likely to occur.

## Financial Equity Interest

Equity Interest ✕

Reporting for\*  
 Self  
 Spouse  
 Dependent Child

Entity's Name\*  
Start typing...

Type of Equity Interest. Select all that apply.\*  
 Stock/Shares  
 Units  
 Options

Provide any other information relevant for it to be determined whether your financial equity interests/activities create an actual, potential or perceived Financial Conflict of Interest. Note: The more details you provide the more expeditious the process will be as additional follow up is less likely to occur.

## Intellectual Property

Intellectual Property ✕

Reporting for\*  
 Self  
 Spouse  
 Dependent Child

Entity's Name (licensee or optionee)\*  
Start typing...

Describe the IP Interest\*

What is their role in the Intellectual Property interest?\*

Inventor  
 Owner  
 Licensee  
 Assignee  
 Other

## Travel

The screenshot shows a form titled "Travel" with a close button (X) in the top right corner. The form contains the following fields and options:

- Travel Sponsor\***: A text input field with a dropdown arrow and the placeholder text "Start typing...".
- Reporting for\***: Three radio button options: "Self", "Spouse", and "Dependent Child".
- Year in which trip(s) took place?\***: A text input field with a calendar icon.
- Travel Destination\***: A text input field.
- Travel Purpose\***: A text input field.
- Total Number of Days\***: A text input field.

At the bottom of the form, there are two buttons: "Cancel" and "Save".

- 3. Additional Information** – This section allows users to provide additional details regarding their or their family member’s financial interest disclosure(s) to assist the review process. If there is no disclosure or if there are no additional details to be added, the user can select “No” using the radio buttons and move to the “Attestation” section. If additional details are to be provided, the user will select “Yes” where a “Please Explain” text box will appear for further details.

The screenshot shows the "Additional Information" section of the form. It features a header with a collapse icon and the text "Additional Information". Below the header, there is a question: "Are there any additional details about you or your Family Member's Financial Interests that may assist in the review of this Financial Interests Disclosure?\*" with two radio button options: "Yes" (selected) and "No". Below the question, there is a text input field labeled "Please explain.\*".

- 4. Attestation** – This section allows users to attest and certify that they have completed the Financial Conflict of Interest in Research Investigation Training Course, have read and understand Florida Atlantic University’s policy on Conflict of Interest Related to Research, and to certify that the disclosure is complete and true to best of their knowledge and that they will comply with any conditions or restrictions imposed by Florida Atlantic University. The user must click the “Certification” checkbox to complete this section.

The screenshot shows the "Attestation" section of the form. It features a header with a collapse icon and the text "Attestation". Below the header, there is a checkbox labeled "Certification" which is checked. Below the checkbox, there are two lines of text: "I have completed the Financial Conflicts of Interest in Research Investigator Training Course." and "I have read and understand the Florida Atlantic University Policy on Conflicts of Interest Related to Research." Below these lines, there is a paragraph of text: "By submitting this information I certify that the disclosure is complete and true to the best of my knowledge. I acknowledge that should my financial interests, or those of my Family Members, change in a way that results in different answers to any of the questions asked in this disclosure. I will submit updated information, if required. I will comply with any conditions or restrictions imposed by Florida Atlantic University.\*"

- 5. Workflow and Requirements** – This section allows users to view the status of their annual SFI disclosure. Since the annual SFI does not require additional approvals, there is only one “Status” and “Requirement”. When the annual SFI section has been complete in full and submitted, the “Completion State” will indicate “Completed” along with who it was completed by and the date of completion.

Workflow and Requirements

| Stage - Revision #   | Created            | Current Status       | Status Date        | Notes |
|--|--------------------|----------------------|--------------------|-------|
| Disclosure - revision #1.1 (05-14-2021)<br><a href="#">Viewing</a> | 02/08/2021 1:33 PM | Disclosure Completed | 05/14/2021 3:52 PM |       |

| Status                        | Requirement                     | Completion State | Revision | Completed by | Completed Date     |
|-------------------------------|---------------------------------|------------------|----------|--------------|--------------------|
| Disclosure Submission Pending | Employee must submit disclosure | ✓ Completed      | #1.1     | Vuong, Tracy | 05/14/2021 3:52 PM |

Disclosure Completed

**6. Save, Submit and Check Validations** – At any time, the user can utilize the save and check validation button at the bottom of the page. The check validation button will alert the users if there are any warning or errors due to incomplete sections or unanswered mandatory questions as designated by a red asterisk. The “Submit” button should only be utilized once all required sections and questions are complete. Once submitted, no additional action is required for the annual SFI until a notification or task is generated by the system.

***Should a proposal submitted by the researcher become funded, then additional actions will be required for the “Project-Specific” or relatedness/project disclosure.***

Attestation

Certification

I have completed the Financial Conflicts of Interest in Research Investigator Training Course.

I have read and understand the Florida Atlantic University Policy on Conflicts of Interest Related to Research.

By submitting this information I certify that the disclosure is complete and true to the best of my knowledge. I acknowledge that should my financial interests, or those of my Family Members, change in a way that results in different answers to any of the questions asked in this disclosure. I will submit updated information, if required. I will comply with any conditions or restrictions imposed by Florida Atlantic University.\*

Workflow and Requirements

| Stage - Revision #                                    | Created            | Current Status                | Status Date        | Notes |
|---|--------------------|-------------------------------|--------------------|-------|
| Disclosure - revision #1.1<br><a href="#">Viewing</a> | 06/08/2021 4:42 PM | Disclosure Submission Pending | 06/08/2021 4:42 PM |       |

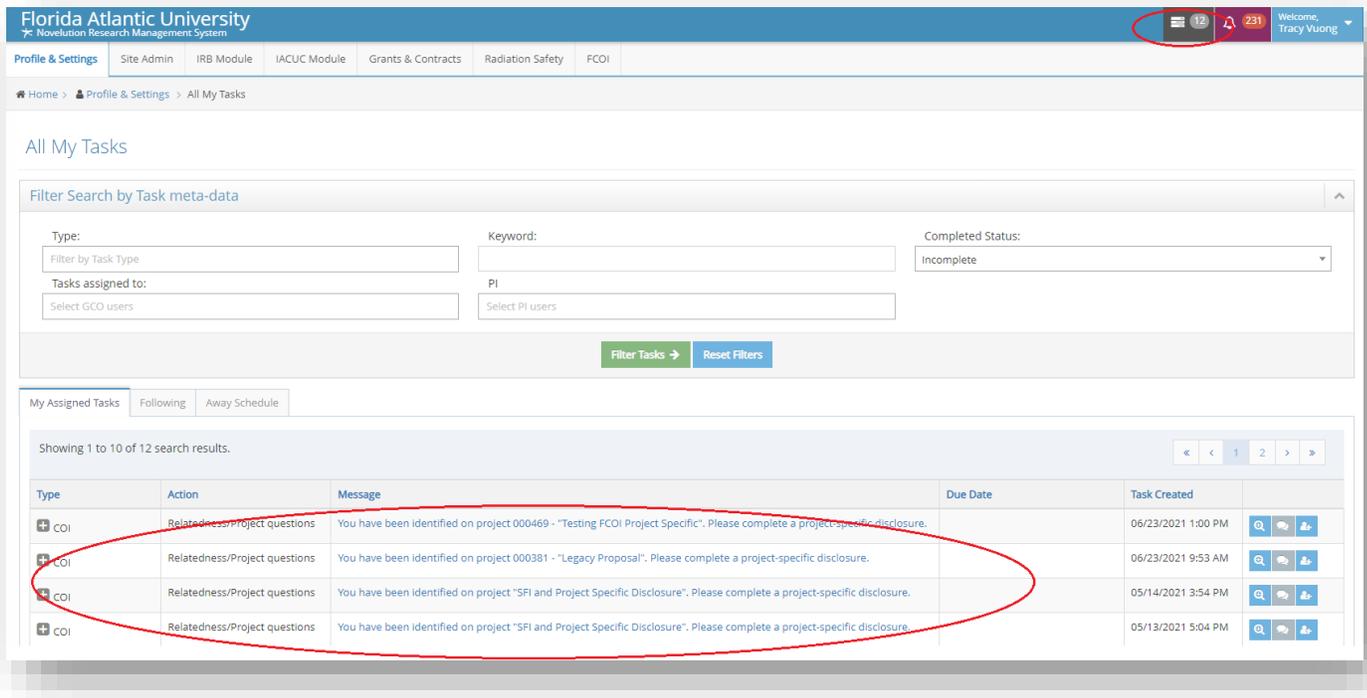
  

| Status                        | Requirement                     | Completion State  | Revision | Completed by | Completed Date |
|-------------------------------|---------------------------------|---|----------|--------------|----------------|
| Disclosure Submission Pending | Employee must submit disclosure | <div style="width: 100%; height: 10px; background-color: green;"></div> Ready |          |              |                |

Disclosure Completed

## Project-Specific Disclosures

The “Project-Specific” or relatedness/project question is only triggered under two (2) conditions. First, there must be a disclosure within the Annual SFI. Second, the proposal/project must be awarded. If all questions within the Annual SFI were checked “No”, there is no additional FCOI action required by the researcher once the proposal status has been updated to award in Novolution. However, if any of the Annual SFI questions were checked “Yes” and an activity was added, upon updating the status to “Award” by the Office of Sponsored Programs, a system-generated task will be created and viewable in the researcher’s “All My Tasks” home/landing page when they first log in.



Florida Atlantic University  
Novolution Research Management System

Profile & Settings | Site Admin | IRB Module | IACUC Module | Grants & Contracts | Radiation Safety | FCOI

Home > Profile & Settings > All My Tasks

### All My Tasks

Filter Search by Task meta-data

Type:  Filter by Task Type | Keyword:  | Completed Status:  Incomplete

Tasks assigned to:  Select GCO users | PI:  Select PI users

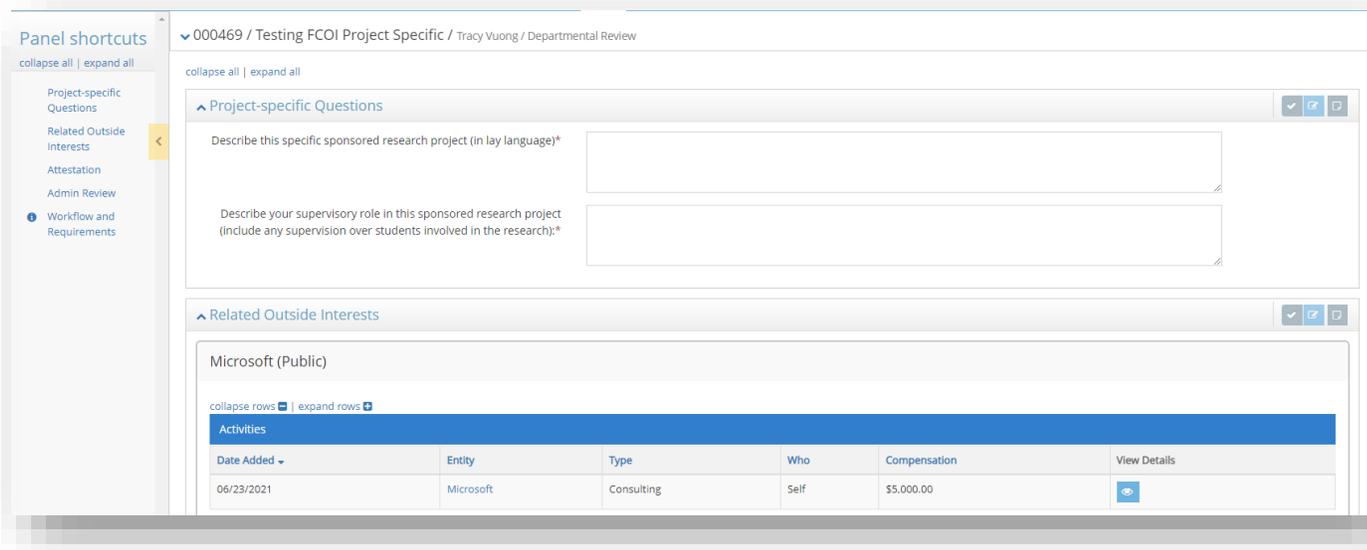
[Filter Tasks](#) [Reset Filters](#)

My Assigned Tasks | Following | Away Schedule

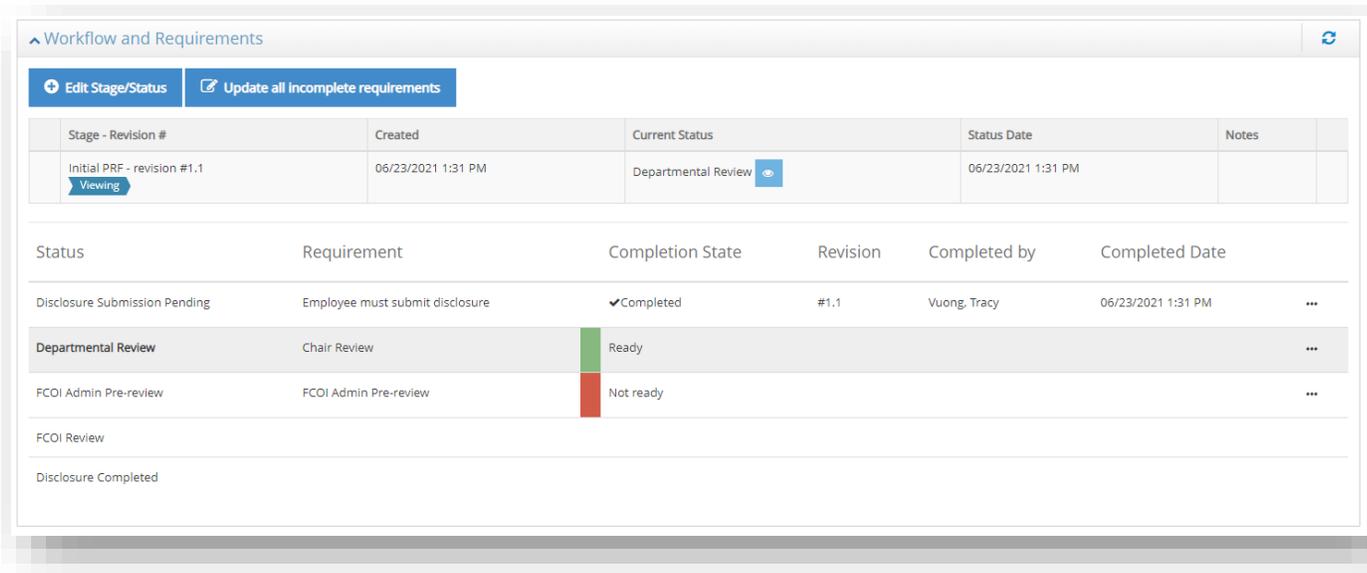
Showing 1 to 10 of 12 search results.

| Type | Action                        | Message  | Due Date | Task Created       |
|------|-------------------------------|--|----------|--------------------|
| COI  | Relatedness/Project questions | You have been identified on project 000469 - "Testing FCOI Project Specific". Please complete a project-specific disclosure. |          | 06/23/2021 1:00 PM |
| COI  | Relatedness/Project questions | You have been identified on project 000381 - "Legacy Proposal". Please complete a project-specific disclosure.               |          | 06/23/2021 9:53 AM |
| COI  | Relatedness/Project questions | You have been identified on project "SFI and Project Specific Disclosure". Please complete a project-specific disclosure.    |          | 05/14/2021 3:54 PM |
| COI  | Relatedness/Project questions | You have been identified on project "SFI and Project Specific Disclosure". Please complete a project-specific disclosure.    |          | 05/13/2021 5:04 PM |

The number of assigned FCOI tasks will be based on the number of proposals the researcher has submitted and were awarded. In the example above, there are 4 total “Project-Specific” disclosure actions that are required to be completed since the Researcher has 4 pending awards. To access the project-specific task, simply click on the “blue” text in the “Message” column which will direct the researcher to that specific project to complete the project-specific disclosure.



When the “Project-Specific” disclosure module is open, there are a new set of disclosure questions that are required to be completed, including “Project-Specific Questions”, “Related Outside Interest”, and “Attestations”. Please note, the number of questions or action required will be based on the number of disclosures and types of disclosures on the Annual SFI. The Researcher must complete all required sections and submit for “Chair Review” and then “FCOI Admin Pre-review”. The FCOI Committee will ultimately review once the FCOI Admin has completed their requirements. Depending on the nature of the disclosure, the FCOI Committee will recommend if or how the conflict will be managed. FCOI related documents by the FCOI Admin and FCOI Committee will be uploaded within Novelution upon its completion.



Upon resolution by the FCOI Committee, if there are no additional “holds” on the awarded proposal, the Office of Sponsored Programs will be notified to proceed with the Post-Award process.