

Conflict of Interest Training

**Office of Research
Integrity & Education**
(303) 871-2121

QUICK LINKS:

CITI Program
www.citiprogram.org



**Federal Register Notice
(8/25/2011) Issuance of
the Final Rule on
Financial Conflict of
Interest Regulations—**

http://grants.nih.gov/grants/policy/coi/fcoi_final_rule.pdf

**Notice of NIH Improving
the Financial Conflict of
Interest (FCI) Module for
Submission of Financial
Conflict of Interest
Reports to the NIH
(4/18/14)**

<http://grants.nih.gov/grants/guide/notice-files/NOT-OD-14-081.html>

**NIH Financial Conflict of
Interest Frequently Asked
Questions, Section L.
Training Requirements**

http://grants.nih.gov/grants/policy/coi/coi_faqs.htm#3223

As part of the revised PHS regulations, the federal government has mandated conflict of interest training for all investigators on projects funded or proposed for funding by PHS agencies, including the NIH.

An "Investigator" is defined as the PI, project director, and any other person, regardless of title or position, who is responsible for the design, conduct, or reporting of research funded by the PHS, including collaborators and consultants.

The University of Denver utilizes the Collaborative Institutional Training Institute (CITI) Program for investigators who are participating, or are planning to participate, in PHS-funded research.

Investigators who do not work on any PHS-funded project need to complete COI training if they:

- Are planning to submit a proposal through the Office of Sponsored Programs for funding from a non-PHS source; or
- Are an investigator on an externally-funded research project not funded by an agency of the Public Health Service; or
- Have disclosed outside financial interest on their University Faculty/Research COI disclosure form; or
- Have been directed by their department chair or dean to complete COI training

All Researchers

On successfully completing your COI training curriculum you will receive a certification that can be printed for your records. To enable the review of the compliance status of investigators, this certification is also available for review by the Office of Sponsored Programs, the Institutional Review Board, (IRB) and the Institutional Animal Care and Use Committee (IACUC) through the CITI website.

Mandatory COI Education

Any University employee engaged in a sponsored program, whether funded by the University; externally sponsored from federal sources, state sources, or foundation, industry, or other private sources, must successfully complete the Conflict of Interest curriculum found online through the Collaborative Institutional Training Institute (CITI) Program. This training must be completed prior to initial receipt of funds, or project initiation if unfunded, and renewed every four years. To access the CITI program go to: www.citiprogram.org.

Who is Required to Complete Conflict of Interest Training?

All key personnel who are responsible for the design, conduct, or reporting of research.

"Key personnel" is defined as the Principal Investigator (PI), Co-PIs, and others who are responsible for the design, conduct, or reporting of research including any employee, or subcontractor/subawardee, who have key responsibility for the design, conduct, or reporting of research. The PI is responsible for determining those individuals who have key responsibility on their grant. PIs are also responsible for obtaining disclosures and ensuring that all mandatory COI training has been successfully completed from individuals identified as having key responsibilities.

The Office of Research Integrity & Education coordinates the collection and maintenance of compliance information, which includes identifying individuals who must complete the required training and maintaining the documentation as part of the award process.



Conflict of Interest Training through CITI

What is CITI? The Collaborative Institutional Training Initiative (CITI) is an online training program that offers training modules in COI and other areas, including human subjects protection, animal care and use, responsible conduct of research etc.

How do I create a CITI account?

Go to CITI's homepage: www.citiprogram.org and click on "Register" and complete the following steps:

Step 1: Select "University of Denver" as your Organization Affiliation.

Step 2: Enter your Personal Information (Name and E-mail Address),

Step 3: Create Your Username and Password.

Step 4: Identify your Country of Residence.

Step 5: Select an Option to Receive Continuing Education Unit (CEU) Credit.

Step 6: Provide Information requested by DU

Step 7: Select Curriculum

Which training modules should I complete?

You will be provided a series of curriculum choices. You will need to select the Conflict of Interest curriculum (Question 3) to fulfill the COI training requirements:

- Question 1: Human Subjects Research
- Question 2: Responsible Conduct of Research
- **Question 3: Conflict of Interest**
- Question 4: Laboratory Animal Welfare
- Question 5: Biosafety
- Question 6: Export Compliance
- Question 7: Health Information Privacy and Security

Once you have successfully completed registration and finished the modules in a selected curriculum, a completion report will be available to document your training. We recommend that you save a copy of this report for your records.

Resources

If you have questions about using the CITI program or completing the COI curriculum, please contact the Research Integrity & Education Director at **303-871-2121**. Please remember that all key personnel involved in a research proposal must complete the COI Disclosure and the mandatory training curriculum to fulfill the federal and University requirements.