

Guidance for Financial Conflict of Interest Education and Training Requirements

1. CITI Conflicts of Interest Course

Under the new U.S. Department of Health and Human Services regulations, as of August 24, 2012, Creighton University requires all Investigators/Support Personnel to complete the new CITI Conflicts of Interest course.

Who has to complete the CITI Conflicts of Interest course?

- All current Investigators/Support Personnel must complete the CITI Conflicts of Interest course on or before October 1, 2012.
- All Investigators/Support Personnel must complete the CITI Conflicts of Interest course before beginning work on any research project, or before submitting a PHS application.

How often am I required to complete retraining on the CITI Conflicts of Interest course?

Investigators/Support Personnel must complete retraining every four years, or more often if:

- Policies and procedures change, affecting the requirements for Investigators/Support Personnel.
- An Investigator/Support Personnel is found to be out of compliance with a financial conflict of interest management plan.

I completed the CITI Conflicts of Interest course at a different institution. Do I have to complete it again for Creighton University?

Investigators/Support Personnel who complete the CITI Conflicts of Interest course at a different institution will only be required to complete the Creighton University portion of the course before starting work on any research project. You must be able to log onto your CITI account.

- If you do not remember your CITI username and password, you will need to contact CITI support at citisupport@med.miami.edu. They will be able to give it to you.
- Once you have your CITI username and password, go to the CITI website at www.citiprogram.org and log in using your CITI username and password.
- Directly below the first two bullets on the Main Menu page is the option to “Affiliate with another institution.” Select this option.
- From the drop down box next to “Participating Institutions,” select Creighton University.
- After updating your registration information, you will be directed to the “Select Curriculum” page. Scroll down to Question #8 – “Would you like to take the Conflict of Interest course?” and select “Yes” and “Continue.”

- You will be taken back to the “Main Menu” page. Scroll down to the Creighton University section. The Conflict of Interest course will be listed under the section “My Courses.” When you enter the course, you will be given credit for the three modules that you completed at the other institution and will only need to complete the “Conflict of Interest Institution-Specific Policy” module.

2. NIH Financial Conflict of Interest Tutorial

All NIH-funded Investigators/Support Personnel must complete the NIH Conflict of Interest tutorial before beginning work on any NIH-funded research project.

I already completed the previous version of the NIH Financial Conflict of Interest tutorial. Am I required to complete the revised version?

NIH-funded Investigators/Support Personnel who have completed the previous version of the NIH Financial Conflict of Interest tutorial are **NOT** required to complete the revised tutorial. However, we recommend that you complete it to familiarize yourself with the new requirements.