

December 3, 2018

To Whom It May Concern:

In response to the Department of Health and Human Services regulations related to the managing of individual conflicts of interest in Public Health Service (PHS) funded research, Central Michigan University's (CMU) policy no. 3-34, *Managing Conflicts of Interest in Public Health Service Funded Research Projects*, mandates that all investigators complete conflicts of interest training prior to engaging in PHS-funded research.

I certify that the enclosed **Central Michigan University Conflicts of Interest Training in Public Health Service Funded Research Projects Implementation Plan** is in place to meet the Conflicts of Interest requirement for PHS funded projects.

Sincerely,



David E. Ash
Vice President for Research and Dean of Graduate Studies

Central Michigan University
Conflicts of Interest Training in Public Health Service Funded Research Projects
Implementation Plan

In response to the Department of Health and Human Services regulations related to the managing of individual conflicts of interest in Public Health Service (PHS) funded research, Central Michigan University's (CMU) policy no. 3-34, *Managing Conflicts of Interest in Public Health Service Funded Research Projects*, mandates that all investigators complete conflicts of interest training prior to engaging in PHS-funded research. This will enable the investigators to understand the policy, their responsibilities regarding disclosure of significant financial interests, and the regulations that form the basis of this policy. The training must be completed:

1. Every four years;
2. Whenever an Investigator is new to a research project and have not yet completed the training;
3. Whenever it is discovered that the Investigator is not in compliance with the policy;
4. Whenever the policy undergoes alterations that affect the responsibilities of Investigators.

For purposes of this training, an investigator is defined as the Project Director or Principal Investigator and any other person, regardless of title or position, who is responsible for the design, conduct, or reporting of research funded by the PHS, or proposed for such funding, which may include, for example, collaborators or consultants.

Training Mechanism

CMU is an institutional member of the Collaborative Institutional Training Initiative* (CITI) and has worked with CITI to offer an online course, *Conflicts of Interest*, available through their web site: <https://www.citiprogram.org>.

An investigator must receive a score of at least 80% on the overall CITI *Conflicts of Interest* course, in order to successfully complete this training requirement. If an investigator receives an overall course score equal to or greater than 80%, but receives a score of less than 80% on an individual module, an email from ORGS will be sent to the investigator. The email will notify the investigator of the individual module(s) that was not successfully completed, and ask the individual to re-read the module and send a confirming email to ORGS that they have done so. If an email back to ORGS is not received **within one week** of notification, the associated grant account may be blocked.

If an investigator does not successfully complete the CITI *Conflicts of Interest* course with a score equal to or greater than 80%, they will be required to retake the course.

**Please note that the CITI RCR modules are separate from the CITI course modules available for Human Subjects training, required for all personnel involved in human subject research. The Conflicts of Interest course may not be used to satisfy CMU's requirements for training in human subjects and vice versa.*

Training Timeline

All investigators must complete the CITI *Conflicts of Interest* course prior to engaging in PHS-funded research.

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