

Investigator/Department Responsibilities

Investigators must disclose all Significant Financial Interests (SFI), as defined in the new regulations, whether or not they are related to their NIH-funded research. The Institution is responsible for determining if the SFI relates to the NIH-funded research and if it represents a Financial Conflict of Interest (FCOI).

Investigator Disclosure Requirements:

1. Investigators are required to submit a [Proposal-Specific Significant Financial Interest Disclosure Form](#) to their immediate supervisor with every new proposal submitted for PHS/NIH funding. "Investigator" includes all individuals who will be involved in the design, conduct, or reporting of the research, regardless of title or position.
2. Investigators on existing NIH awards must submit the [Proposal-Specific Significant Financial Interest Disclosure Form](#) to their immediate supervisor with the submission of the next annual progress report to NIH.
3. The Principal Investigator on an NIH proposal must identify all individuals who meet the definition of Investigator and insure that they submit the disclosure form to their immediate supervisor.
4. Disclosure forms must be updated and submitted within 30 days of acquiring any new significant financial interest, and annually at the time of the submission of the annual progress report for the NIH-funded award.
5. If it is determined that a financial conflict of interest exists between the proposal/award and one of the disclosed SFIs, the conflicted Investigator must agree to a management plan to reduce or eliminate the conflict. For new awards, the management plan must be submitted to the ORA when the Principal Investigator receives the request for Just-In-Time information. For existing awards, the management plan must be submitted within 30 days of the identification of the conflict.

Department Chair / Supervisor Responsibilities:

1. Review and certify all disclosure forms and determine if a conflict of interest exists with the NIH proposal.
2. Certify to the Office of Research Administration that all investigators on the proposal have submitted a disclosure form (The responsible Grant Coordinator will request this certification via email before the proposal is submitted).
3. Forward all disclosure forms to the ORA within 15 days of institution receiving a Just-In-Time request.
4. For all identified conflicts of interest, work with the investigator to develop a conflict management plan. Forward to ORA all management plans within 15 days of institution receiving a Just-In-Time request. All conflict management plans will be reviewed and approved by the ORA. Plans must either reduce or eliminate the conflict. Plans must be in place prior to expenditure of any grant funds.

Conflict of Interest Training Requirements:

1. All Investigators on existing NIH awards that were awarded prior to August 24, 2012, must complete the on-line Financial Conflict of Interest course available on The University of Akron's CITI site by September 30, 2012. This training must be renewed every 4 years.
2. Investigators on new awards received after August 24, 2012, must complete the on-line Financial Conflict of Interest course prior to engaging in research related to the NIH-funded grant, and at least every 4 years.

The CITI Training can be accessed at <http://www.citiprogram.org>

1. Affiliate with "The University of Akron"
2. Select "Financial Conflict of Interest" from the curriculum list
3. Complete all three required modules and take the related quizzes
4. The Office of Research Administration will receive notification of your completion and will file the reports in the award file.