Training - Financial Conflict of Interest on Sponsored Projects

The Public Health Service (PHS) published a Financial Conflict of Interest (FCOI) Regulation in the Federal Register which takes effect no later than August 24, 2012. The UMMS Policy for Promoting Objectivity in Biomedical Research has been revised to incorporate this requirement, making it applicable to all sponsored research funding sources at the University of Massachusetts Medical School.

One requirement of the newly implemented regulation is that all investigators must complete FCOI training, before engaging in the research. **An investigator is defined as the principal investigator and any other person, regardless of title or position, who is responsible for the design, conduct or reporting of the research.** The UMMS Principal Investigator will determine who meets this definition on their projects.

The UMass Medical School Plan to Provide FCOI Training

Each individual meeting the regulation’s definition of investigator must complete FCOI training prior to engaging in the research and every four years thereafter.

UMMS offers a specific FCOI training class that will satisfy the regulatory requirement. FCOI training is offered through the CITI Online training module and can be accessed at [http://www.citiprogram.org/](http://www.citiprogram.org/).

Investigators should take the mandatory training as soon as possible. Once taken the training is valid for four years. Training is valid for four years; at the end of each four-year period investigators will be required to take the training again.

New users should click on the “Register Here” link to initiate the registration process:
The following registration screen will appear. Select “University of Massachusetts Worcester” from the “Participating Institutions” drop down box (circled below):

Follow the remaining instructions to register. Please use your umassmed email address as the preferred e-mail address when registering (you can provide a non-umassmed e-mail address as your secondary e-mail). Once you have successfully created your account and logged in the following screen will appear - please fill in the requested information and submit:
After clicking “Submit”, the Select Curriculum page will appear. To choose the COI training, select the “Yes” answer to Question 3 and click the “Submit” button:

After completing this page, CITI will ask whether you want to register with another institution. Select “No”.

After clicking “Submit”, the Select Curriculum page will appear. To choose the COI training, select the “Yes” answer to Question 3 and click the “Submit” button:

After completing this page, CITI will ask whether you want to register with another institution. Select “No”.
The Main Menu will appear with your course selection:

To enter the course, click on the “Enter” link under “Status”.

Verification of FCOI Training

Research Funding Services is responsible for verifying that investigators on sponsored projects have received FCOI training. RFS will not set up projects until investigator training has been confirmed.

It is the PI’s Responsibility to Ensure that a Project’s Key Personnel are Trained

PIs have the responsibility to ensure that all individuals meeting the regulation definition of an investigator have taken the mandatory FCOI training prior to engaging in the research.

Questions

If you have any questions please contact Diego Vazquez, Assistant Vice Provost, Research Funding Services at 508-856-5600, or via email at diego.vazquez@umassmed.edu.