

TO: Health Sciences Faculty

FROM: Arthur S. Levine, M.D.

DATE: August 21, 2012

SUBJECT: Revised Conflict of Interest Policy and Required Training

By now, you should have received Vice Provost George Klinzing's August 2012 memorandum on the above topic, advising all University faculty of actions they need to take to comply with new regulatory requirements imposed by the U.S. Public Health Service (PHS). These regulations establish a lower threshold (\$5,000) for reporting outside interests of investigators funded by or applying to the PHS; mandate conflict of interest training for all investigators participating in research funded by or proposed to the PHS; and, require public disclosure by the University of reported conflicts.

Compliance with these new regulations will require that, beginning **August 24, 2012**:

- 1) **Every faculty investigator** must complete the new conflict of interest training module found at: <http://www.coi.pitt.edu/COITraining.htm>. **Choose** the module that applies to you:
  - a) The module for *Investigators with PHS support* (or those expecting to apply for PHS support); **or**,
  - b) The module for *Investigators not working on PHS-funded research* **or** those who have disclosed outside financial interests on their Faculty/Researcher form.
- 2) **All faculty funded by or applying for funding from a PHS agency** must complete the new Faculty/Researcher Conflict of Interest disclosure form, which reflects the lower reporting thresholds under the PHS regulations. Your current activities should be reported on this form, which can be found at: <http://www.coi.pitt.edu/COIforms.htm>

**Please note that, effective August 24, 2012, the University's Office of Research will no longer be able to process grant proposals that include faculty who have not completed the above steps.**

You may refer to Dr. Klinzing's attached memorandum (below) or to the website: <http://www.coi.pitt.edu> for a more complete description of these changes and your important role in the University's compliance with them. If you have additional questions, please call Dr. Klinzing's office at 412-624-0784.

Thank you.