

**FINANCIAL CONFLICT OF INTEREST TRAINING INFORMATION  
FOR PHS/NIH INVESTIGATORS**

Public Health Service (PHS) regulations require that all investigators working on PHS-funded projects, which include National Institutes of Health grant awards, receive training on Financial Conflicts of Interest (FCOI). "Investigator" means 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 must be completed prior to engaging in research related to any PHS-funded grant and at least every four years, and immediately when any of the following circumstances apply:

- (1) The Institution revises its financial conflict of interest policies or procedures in any manner that affects the requirements of Investigators;
- (2) An Investigator is new to an Institution; or
- (3) An Institution finds that an Investigator is not in compliance with the Institution's financial conflict of interest policy or management plan.

Specific to the implementation of these new requirements:

If you have applied for PHS/NIH funds you should complete training by the issue date of your Notice of Award received on August 24, 2012, or thereafter.

All other investigators must complete the FCOI training prior to establishment of an account for a grant or contract awarded on August 24, 2012, or after.

SUNY Geneseo has chosen to utilize the Collaborative Institutional Training Initiative (CITI) online Conflict of Interest mini-course to satisfy the PHS FCOI training requirement. To register for and complete the COI mini-course, please follow these instructions:

1. Go to the CITI website: <https://www.citiprogram.org/>
2. Click on "Register Here."
3. Choose "SUNY-Geneseo" from the drop down list of Participating Institutions, and register a username and password. Complete other required registration information as indicated.
4. Enroll for the Conflict of Interest course.
5. Complete all three required modules. Each module will take an estimated 30-60 minutes each to complete.
6. Pass quizzes at the end of each with a combined score of at least 80%. The link to each module quiz is at the bottom of each module below the references.
7. Print out the CITI COI Course Completion Report and send a copy to Anne Baldwin, Office of Sponsored Research. A PDF sent via email is fine.

If you have questions, please contact Anne Baldwin, Office of Sponsored Research ([baldwinA@geneseo.edu](mailto:baldwinA@geneseo.edu) or x5547).

***Applicable regulations and policies:***

Responsibility of Applicants for Promoting Objectivity for Research for Which Public Health Service Funding is Sought (42 CFR Part 50, Subpart F) & Responsible Prospective Contractors (45 CFR Part 94).

The Research Foundation for The State University of New York ("RF") Conflict of Interest Policy, effective date July 23, 2012.