

http://grants.nih.gov/grants/policy/coi/coi_faqs.htm#3219

FCOI Training

Institutions are required to train Investigators “immediately” upon certain situations. How is “immediately” defined in this context? (Institution)

NIH expects Institutions to define “immediately” in the Institution’s Financial Conflict of Interest policy, which would establish a reasonable timeframe when Investigators must complete training under the prescribed circumstances. Although the regulation does not define a precise timeline, the expectation is that Institutions will make it a priority to ensure Investigators understand and comply with the requirements of the regulation and the Institution’s Financial Conflict of Interest policy, which reinforces the need for training to be handled expeditiously.

Does the regulation require Investigator training? (Institution and Investigator)

Yes. Each Investigator (as defined by the regulation), including sub-recipient Investigator(s), must complete training and be made aware of University’s FCOI Policy Statement prior to engaging in NIH-funded research and at least every four years, and immediately under the designated circumstances:

- Institutional Financial Conflict of Interest policies change in a manner that affects Investigator requirements
- An Investigator is new to an Institution
- An Institution finds that an Investigator is not in compliance with the Institution’s Financial Conflict of Interest policy or management plan.

Institutions may utilize resources available on NIH’s Office of Extramural Research Financial Conflict of Interest Web page found at <http://grants.nih.gov/grants/policy/coi/> to satisfy some of the training requirements. However, Institutions must also provide additional training regarding Investigator’s responsibilities for disclosure of Significant Financial Interests and of the Institution’s specific policy on financial conflicts of interests.