

RE: For PHS-funded investigators – Federal training requirement!

** ** ** ** **

Critical Training Points for COI Education, Required for all PHS-funded Investigators

Federal regulations require the University to inform all PHS-funded investigators of updated DHHS financial conflict of interest regulations and the newly-revised CWRU policy, both of which take effect August 24, 2012. Please review each of the following statements:

- Case Western Reserve University (CWRU) is committed to the highest standards for objectivity in research.
- We have a conflict of interest policy that complies with the [federal regulations](#). You can read the CWRU COI policy [here](#). More information about CWRU COI policy and procedures can be found [here](#).
- Depending on the nature of your appointment, it is possible that your disclosures should be made through one of [CWRU's clinical affiliates](#). If your primary appointment is with Louis Stokes Cleveland Veterans Affairs Medical Center, you are required to complete the annual CWRU Outside Financial Interest Disclosure Form. Individuals at the VA and other affiliates may be subject to additional disclosure requirements.
- You are required to disclose all applicable outside interests covered by the policy at least once a year.
- After you make an annual disclosure, you must also provide updates **within 30 days** if your outside interests change or if the value or nature of your interests changes.
- At the time of each new grant proposal, you will be asked to verify that all of the information on your most recent disclosure is complete and accurate. If it is not, you must update information by the time of proposal submission.
- If you disclose a significant financial interest, it will be evaluated to determine whether or not it represents a conflict of interest (COI) with your research activity or other university responsibilities.
- If you have a COI with a Public Health Service (PHS)-funded study, CWRU must manage, reduce or eliminate the COI, and report this information, as applicable, to the Department of Health and Human Services (DHHS).
- The threshold for considering an interest as significant is \$5,000 in payment or other consideration from any one source or entity.
- PHS-funded investigators are required to disclose travel that is sponsored by non-governmental or non-higher education entities.
- CWRU will respond meaningfully within five days to any written request for information about COIs related to any PHS awards made to CWRU.
- Violations of policy or management plans may result in corrective actions.

For additional information, please see the Conflict of Interests Committee web page, <http://ora.ra.cwr.edu/research/orc/coi/> or contact the COI Staff: email caseoic@case.edu, telephone (216) 368-5963.