

**Carnegie Mellon University**  
**Financial Conflicts of Interest in Research Compliance**

Quick Reference				
	Public Health Service (PHS) <sup>1</sup> Funding (includes NIH)	All Other Federal Funding	SEI Staff	NREC Staff
<b>Who must certify and disclose?</b>	Investigators submitting proposals to or receiving an award from a Public Health Service Agency or another sponsor that follows PHS requirements.	Investigators submitting proposals to or receiving an award from a federal funding agency other than PHS agencies	All SEI staff unless exempted by the SEI Ethics and Compliance office	All NREC staff unless exempted by NREC
<b>Who is an Investigator?</b>	The Project Director, Principal Investigator or any other person, regardless of title or position, who is responsible for design, conduct or reporting of research funded or proposed for funding. This includes key personnel identified in the grant application, progress report or other report submitted to the funding agency by the Institution.	The Project Director, Principal Investigator or any other person, regardless of title or position, who is responsible for design, conduct or reporting of research funded or proposed for funding.	N/A	N/A
<b>What must be disclosed?</b>  See the CMU Guidelines for details.	<ul style="list-style-type: none"> <li>▪ <u>Significant Financial Interests</u> related to your Institutional Responsibilities. \$5,000 threshold.</li> <li>▪ Sponsored and reimbursed travel above \$5,000 per organization.</li> </ul>	<u>Financial Conflicts of Interests.</u> \$10,000 threshold.	\$15,000 threshold; see the SEI COI Policy for details	Follow the “All Other Federal Funding” rules by default, unless receiving PHS funding.
<b>When is a Certification required?</b>	<ul style="list-style-type: none"> <li>▪ Annually.</li> <li>▪ As requested by ORIC</li> <li>▪ Within 30 days of acquiring a new SFI</li> </ul>	<ul style="list-style-type: none"> <li>▪ Annually.</li> <li>▪ As requested by ORIC</li> <li>▪ Update as needed</li> </ul>	<ul style="list-style-type: none"> <li>▪ When beginning work at the SEI</li> <li>▪ Annually</li> </ul>	<ul style="list-style-type: none"> <li>▪ When beginning work at NREC</li> <li>▪ Annually</li> </ul>
<b>How do I certify and disclose?</b>	You will receive an e-mail with a link to begin your Certification. Log on to SPARCS	You will receive an e-mail with a link to begin your Certification. Log on to SPARCS	You will receive an e-mail with a link to begin your Certification. Log on to SPARCS	You will receive an e-mail with a link to begin your Certification. Log on to SPARCS

Quick Reference				
	Public Health Service (PHS) <sup>i</sup> Funding (includes NIH)	All Other Federal Funding	SEI Staff	NREC Staff
	( <a href="http://sparcs.cmu.edu">http://sparcs.cmu.edu</a> ) and follow the instructions.	( <a href="http://sparcs.cmu.edu">http://sparcs.cmu.edu</a> ) and follow the instructions.	( <a href="http://sparcs.cmu.edu">http://sparcs.cmu.edu</a> ) and follow the instructions.	( <a href="http://sparcs.cmu.edu">http://sparcs.cmu.edu</a> ) and follow the instructions.
<b>Who will see my information?</b>	<ul style="list-style-type: none"> <li>▪ Staff in the Office of Research Integrity and Compliance (ORIC) will review all Certifications.</li> <li>▪ Certifications indicating a potential conflict of interest may be shared on a limited basis; see the CMU Guidelines for details.</li> </ul>	<ul style="list-style-type: none"> <li>▪ Staff in the Office of Research Integrity and Compliance (ORIC) will review all Certifications.</li> <li>▪ Certifications indicating a potential conflict of interest may be shared on a limited basis; see the CMU Guidelines for details.</li> </ul>	<ul style="list-style-type: none"> <li>▪ Staff in the SEI Ethics and Compliance Office as well as in ORIC may review disclosures.</li> <li>▪ Any additional sharing of information will be subject to SEI's policy and processes; contact the SEI Ethics and Compliance office for details</li> </ul>	<ul style="list-style-type: none"> <li>▪ Staff in ORIC will review all Certifications.</li> <li>▪ Certifications indicating there may be a conflict of interest may be shared with the Vice President for Research, the Conflict of Interest Committee, legal counsel or the Investigator's department head.</li> </ul>
<b>What if I have a conflict of interest?</b>	<ul style="list-style-type: none"> <li>▪ Conflicts of interest must be managed, reduced or eliminated. Management plans are often used to manage the risk of bias in research and allow the research to be conducted.</li> </ul>	<ul style="list-style-type: none"> <li>▪ Conflicts of interest must be managed, reduced or eliminated. Management plans are often used to manage the risk of bias in research and allow the research to be conducted.</li> </ul>	<ul style="list-style-type: none"> <li>▪ Conflict of interest review and management will be conducted by the SEI Ethics and Compliance Office; contact this office for detailed guidance.</li> </ul>	<ul style="list-style-type: none"> <li>▪ Conflicts of interest may be managed by NREC or ORIC depending on the circumstances.</li> </ul>

Faculty, staff, and students who are involved in research on campus as well as participating in SEI research as campus collaborators are required to comply with **both** the rules that apply to your own research funding **and** those applying to SEI staff, as long as the collaboration is ongoing.

<sup>i</sup> PHS agencies include: Agency for Healthcare Research and Quality, Agency for Toxic Substances and Disease, Registry, Centers for Disease Control and Prevention, Food and Drug Administration, Health Resources and Services Administration, Indian Health Services, National Institutes of Health, and Substance Abuse and Mental Health Services Administration.