1. **Become Familiar With Pitt’s Policy Regarding Faculty Use of University Time for Outside Professional Activities**

As a center for innovation and a regional economic partner, the University of Pittsburgh recognizes the benefit of sharing the expertise of its faculty with government, nonprofit, and commercial entities. To that end, full time faculty are permitted to use up to one day per week on the average of their University time over the period of their contractual appointment at the University and any summer months during which they receive compensation for teaching, research, or other University activities on outside professional work. Faculty may also engage in such activities during their personal time.

- University time spent on outside professional activity must not exceed an average of one (1) day per week, up to 35 days (for 8-month appointees) or 48 days (for 11-month appointees) each academic year.
- Weekends and evenings (the time not part of a nominal 40-hour, 5-day work week) are not counted in these limits.
- During the summer months, faculty with 8-month appointments have no restrictions on the amount of time spent in outside activities unless they are being compensated by the University for summer employment/activities (summer teaching, summer research, or other activities).
- Similarly, there are no restrictions for 11-month appointees on the number of days of outside professional activity during vacation periods.

Regardless of whether the work is conducted during personal or University time, faculty members must seek the prospective approval of their department chair or equivalent supervisor and disclose their financial and management interests for conflict of interest review purposes. Faculty and their supervisors are responsible for ensuring that the faculty member is not spending more than the approved amount of time on outside work and that the outside work is not otherwise negatively impacting the faculty member’s performance of their University duties. The supervisor may reduce the amount of University time a faculty member may devote to outside activities by providing a written justification for the reduced limit.

Incidental Use of any University resources (as defined and described in sections II.H and III.E of Policy 11-01-03) in performance of outside professional activities must be approved in advance by the department chair and/or other relevant supervisor. In no case may faculty use University or UPMC confidential data, funds, trademarks, or logos in performing outside work.

*Link to Additional University Policies related to COI*
2. **Complete Required Online Training**

Anyone wishing to pursue external grant or contract funded at the University of Pittsburgh is required to complete training prior to beginning the project, regardless of funding source. Training requirements vary based on the nature of the research. While there are obvious differences in training requirements for those performing animal subject research and human subject research, there are requirements that may be applicable to all research. Those requirements that cross domains are listed separately and should be reviewed closely.

A chart detailing additional required trainings for faculty and researchers can be accessed on the [Research Conduct and Compliance Office (RCCO) website](#).

All individuals are required to complete the [CITI Responsible Conduct of Research](#) course before performing research activities. In addition, the University of Pittsburgh COI Policy (11-01-03) requires that all investigators who are externally funded (regardless of funding source) must complete the [CITI COI](#) course.

**COI Training Requirement:**

All University of Pittsburgh investigators are required to complete COI training on appointment. **Investigators who are externally funded, regardless of sponsor, must complete COI training within four years prior to commencing or engaging in any externally funded research activity and must renew their training at least every four years.**

The Principal Investigator (PI) is responsible for identifying the individuals who meet the definition of an “investigator”. When funding is awarded, the PI must provide the Office of Research with a list of those who meet this definition and the date of completion of the CITI COI course.

**Responsible Conduct of Research Required Training:**

All individuals involved in research are required to complete the CITI Responsible Conduct of Research course before performing research activities. This requirement also applies to faculty mentors listed in the IRB application who are responsible for the conduct of research for their students. **Re-certification is required every 4 years.**

The Principal Investigator (PI) is responsible for identifying the individuals who meet the definition of an “investigator” and instruct those individuals to complete the applicable Responsible Conflict of Interest course. (Generally the basic course is sufficient)

**Accessing the CITI COI Training:**

**New Investigators:**

1. Access the [Pitt CITI COI Training portal](#).
2. After logging in with your Passport account, select “View Courses” next to University of Pittsburgh. (Please note, you may need to enter registration information if you have not yet registered).
4. On the next "Select Curriculum" screen, select "Conflict of Interest."

5. All investigators performing research funded in full or in part by the Public Health Service (PHS), and all investigators with primary appointments in the Schools of the Health Sciences (SOHS) conducting any form of externally funded research, regardless of funding source, must select the "COI PHS Regulated Course." All other investigators with a non-SOHS appointment and who are not performing PHS-funded research may select the "Non PHS Regulated" course.

6. Once registered, the investigator can complete the training module(s).

Returning Investigators:
1. Access the Pitt CITI COI Training portal.
2. After logging in with your Passport account, select “View Courses” next to University of Pittsburgh.
3. The Main Menu page will indicate courses that need to be retaken or renewed. Select the "COI PHS Regulated Course" or "COI Non-PHS Regulated Course" to recertify training.

Additional Information:
* Instruction Sheet for Accessing and Navigating CITI

* University Policy on Research Integrity (PDF)

3. File a COI Disclosure Form

COI disclosure forms must be filed at the following times:
- Upon appointment to the University of Pittsburgh
- Annually before July 15, or if July 15 falls on a holiday or weekend, the first business day following the 15th
- Throughout the year whenever an employee's outside financial interests change, within thirty (30) calendar days of a change

All faculty members must have a current and accurate COI disclosure form on file prior to applying for sponsored project funding.
- Personnel participating in any form of research that is funded in full or in part by the Public Health Service (PHS) must complete the University of Pittsburgh Faculty/Researcher (PHS Funded) version of the COI form.
- All other faculty and researchers who do not participate in PHS funded research must complete the "regular" University of Pittsburgh Faculty/Researcher COI form. Personnel do not complete both forms.
In addition, some faculty and staff are required to complete a University of Pittsburgh Designated Administrator/Staff COI form.

After completing the appropriate form, a "Filing History" page will appear. Employees must print out and sign a copy of the signature page for each form completed for the current calendar year. The signature pages are accessed by clicking on the form ID numbers in the list of submitted forms.

Once the signature page is printed and signed employees give it to their direct supervisor for review. All employees must do this even if he or she does not have any outside interests to report.

Submit or Update a COI Disclosure Form

In 2018, after a comprehensive shared governance and stakeholder engagement process, the University of Pittsburgh updated its policy on Conflict of Interest for Research. This update addresses current federal guidance and provides a simple yet comprehensive framework for the University to identify and manage potential conflicts.

To simplify and modernize reporting and review of disclosures, Pitt and UPMC have now worked together to develop an online joint disclosure system called MyDisclosures.

MyDisclosures replaces the old COI SuperForm system. The new annual disclosure deadline is July 15, 2020.

Complete your annual COI disclosure form or submit an update to include new financial interests.

Learn the basics of MyDisclosures by viewing this presentation.

4. Complete Required Intellectual Property Assignment

In general, under University policies, the University claims ownership and control over all inventions, patents, patentable developments, certain types of copyright protected material, and related know-how developed by its faculty, staff and, in some cases, students.

The University is returning to a set of IP assignment options that closely resemble previous options while being compliant with the federal government's May 2018 Bayh-Dole revisions. Completed IP Assignments will be required to be on file at the Innovation Institute before the Office of Research will activate grants or contracts.

* Please send ORIGINAL signed copy to: Courtney DeCarlucci; LH202