

Guidance for eRA Commons Requirements

If the Conflict of Interest Review Committee (CIRC) determines that a disclosed significant financial interest held by an NIH-funded Investigator/Support Personnel constitutes a financial conflict of interest, Creighton University is required to submit information about the conflict to the NIH granting agency.

Creighton must submit the following information via the eRA Commons FCOI Module:

- Name of the entity with which the Investigator/Support Personnel has a financial conflict of interest
- Nature of the significant financial interest (will be selected from a drop-down menu)
- Value of the significant financial interest (will be selected from a drop-down menu)
- Description via text box or uploaded PDF of how the financial interest relates to the NIH-funded research and why Creighton University determined that the financial interest conflicts with research
- Description via text box or updated PDF of the key elements of the management plan, including other required information.
- Verification that Creighton University is submitting an FCOI report that is compliant with the regulation

If the CIRC determines that an Investigator/Support Personnel has a financial conflict of interest due to a significant financial interest that was not reported on his/her initial or annual disclosure form, Creighton University must submit a revised FCOI report following a retrospective review. In addition, the module will allow for the submission of a mitigation report if bias is found following a retrospective review.