July 31, 2003

TO: Investigators involved in human subjects research

FROM: Executive Vice Chancellor Daniel Neuman

RE: NIH requirement for training key personnel

I am writing to update guidance provided by then-Executive Vice Chancellor Wyatt R. Hume on August 21, 2000, regarding the National Institutes of Health (NIH) policy that requires UCLA to certify that all key personnel have completed education on the protection of human research subjects. To meet the requirements of the NIH policy, UCLA initiated a UCLA-specific web-based training program and requires all key personnel to complete a certificated program of education on the protection of human research subjects at least once every two years. The UCLA program consists of four general modules and two specialized modules: one on biomedical research; the other on social behavior research. New users must complete all four general modules and as applicable, the biomedical or social behavioral module. Users who are renewing certifications can do so by completing two of the general modules and as applicable, the biomedical or social behavioral module. Certificates are issued after participants take and pass a short test. The UCLA web-based program, which has been recently updated, may be found at: http://www.training.arc.ucla.edu/index.htm.

For the purposes of the NIH policy, key personnel is defined as individuals who contribute in a substantive way to the scientific development or execution of the project and are identified as such within the proposal. This includes UCLA personnel as well as consultants and key personnel at subrecipient institutions.

Non-UCLA affiliated key personnel including consultants (when none of their work is performed at UCLA) and personnel participating on subgrants or subcontracts may complete either the UCLA-specific program, the educational program specified by their home institutions, or the course developed by the NIH.

Principal Investigators are asked to provide the Office for the Protection of Research Subjects (OPRS) with copies of the certificates of completion when the proposal and supporting materials are submitted for review. Since UCLA is required to provide NIH with assurance that all key personnel (identified as such in the proposal) have completed a mandatory educational program copies of the certificates of completion for the Principal Investigator and all other key personnel should also be submitted to the Office of Contract and Grant Administration (OCGA) so that an appropriate letter of assurance can be forwarded to the NIH.

Questions on these policies can be directed to Ann Pollack, Assistant Vice Chancellor – Research at apollack@resadmin.ucla.edu or by phone at x40387; or to Steven Peckman, Associate Director, OPRS, at speckman@oprs.ucla.edu or by phone at x55344.