



# Washington University in St. Louis

## Faculty Guide to Compliance Requirements

This guide was developed as a tool to provide convenient and concise information regarding the various compliance activities faculty members at Washington University are required to fulfill. To use this guide, simply find the activity you are engaged in and then the applicable requirements will be listed in the *Requirement* column, with subsequent information provided on how to complete the requirement, hyperlinks that go directly to the requirement, and the estimate time it will take fulfill the requirement. The hyperlinks located in the *For More Information* column will take you to appropriate websites for additional information. If you have questions regarding a specific requirement, please contact the applicable office.

While every effort has been made to develop a comprehensive list, this may not represent the entire list of requirements faculty are required to fulfill. Please call 747-5571 with any suggestions on how to improve this guide.

CORE REQUIREMENTS:						
Activity	Requirement	Reason for Requirement	Necessary Steps to Fulfill Requirement	Estimated Time Requirement	To Fulfill the Requirement	For More Information
All Faculty	Basic EHS Training  Required for all faculty hired after <b>March 10, 2008</b>	Faculty must complete basic safety training.	<ol style="list-style-type: none"> <li>1. Enter your employee ID number and AIS/HRMS password (or your WUSTL Key)</li> <li>2. Click Go To Breeze Training then select Basic EHS Training from the menu</li> <li>3. Follow the instructions provided</li> </ol>	.25 Hours One-time only	<a href="#"><b>LOG-IN TO TAKE TRAINING</b></a>	<a href="#"><b>ADDITIONAL INFORMATION</b></a>  Environmental Health and Safety 935-9264
	Code of Conduct	The Code of Conduct underscores the University's commitment to integrity, ethical conduct, and legal compliance in everything we do.	<ol style="list-style-type: none"> <li>1. Enter your employee ID number and AIS/HRMS password (or your WUSTL Key)</li> <li>2. Follow the instructions provided.</li> <li>3. Read Materials</li> <li>4. Certify Commitment</li> </ol>	.5 Hour Annually	<a href="#"><b>LOG-IN TO COMPLETE</b></a>	<a href="#"><b>ADDITIONAL INFORMATION</b></a>  University Compliance Office 362-4910
	Financial Disclosure Statement (COI)	Washington University policies and Federal Regulations require financial disclosures on a regular basis or as changes occur in financial interests or research/patient care activities.	<ol style="list-style-type: none"> <li>1. Enter your employee ID number and AIS/HRMS password (or your WUSTL Key)</li> <li>2. Then follow the instructions provided</li> </ol>	.25 – 1 Hour Annually	<a href="#"><b>LOG-IN TO COMPLETE</b></a>	<a href="#"><b>ADDITIONAL INFORMATION</b></a>  Research Ethics and Compliance Office 747-2904
All Faculty who complete a PAR or who are paid from sponsored funds and/or cost sharing accounts	Effort Reporting Principles	Faculty are required to complete Effort Reporting Education as a commitment to the stewardship of federal funds and the appropriate proposing and reporting of effort	<ol style="list-style-type: none"> <li>1. Enter your employee ID and pass word (or WUSTL Key)</li> <li>2. Click Breeze Training in the left-hand menu</li> <li>3. Click Login to Breeze and then Launch Breeze</li> <li>4. Select the appropriate training</li> </ol>	.5 Hour One-time only	<a href="#"><b>LOG-IN TO TAKE TRAINING</b></a>	<a href="#"><b>ADDITIONAL INFORMATION</b></a>  Research Education and Information 747-5574
All School of Medicine (WUSM) Faculty with an appointment in a clinical division.	Expert Witness Affirmation	WUSM has established a Code of Conduct, as well as this Policy for Expert Witness Testimony, for faculty members who serve as expert witnesses.	<ol style="list-style-type: none"> <li>1. Read the Expert Witness Code of Conduct.</li> <li>2. Print and sign the Expert Witness Affirmation</li> <li>3. Mail form to the Office of Risk Management</li> </ol>	.25 Hour One-time only  However, expert witness testimony must be reported to Risk Management and confirmed annually.	<a href="#"><b>POLICY AND AFFIRMATION FORM</b></a>	Risk Management 362-6956

**REQUIREMENTS BASED ON A SPECIFIC ACTIVITY:**

Activity	Requirement	Reason for Requirement	Necessary Steps to Fulfill Requirement	Estimated Time Requirement	To Fulfill the Requirement	For More Information
Research involving <b>Animals</b>	Animal Studies Education	Animal Welfare regulations and the Public Health Service Policy require institutions to ensure that people caring for or using animals are qualified to do so.	<ol style="list-style-type: none"> <li>1. Click on link provided to the right</li> <li>2. Read Introductory Slides</li> <li>3. Click on link to training modules</li> </ol>	.5 – 1.5 Hours One Time Only and Annual depending on modules	<a href="#"><u>INTRODUCTION TO TRAINING</u></a>	<a href="#"><u>ADDITIONAL INFORMATION</u></a>  Department of Comparative Medicine 362-3700
	ASC Protocol	The ASC is required by federal regulations to review all projects (research, teaching, or other) involving the use of vertebrate animals. This is required if funding is through Washington University, or if the animal is housed at this institution.	<ol style="list-style-type: none"> <li>1. Complete eSirius account request form</li> <li>2. Fax completed and signed form to ASC</li> <li>3. eSirius account will be set up upon receipt and your log-in and password sent to you</li> </ol>	1 – 1.5 Hours	<a href="#"><u>ACCOUNT REQUEST FORM</u></a>	<a href="#"><u>ADDITIONAL INFORMATION</u></a>  Animal Studies Committee office 362-3229.
Participating in <b>CME activities</b> sponsored by WUSM	CME Disclosure of Financial Relationships	All speakers, planning committee members, or persons in a position to influence the content of an educational activity, are expected to disclose to the audience any financial interest or other relationship	<ol style="list-style-type: none"> <li>1. Enter your employee ID number and e-mail</li> <li>2. Then follow the instructions provided</li> </ol>	.25 - .5 hour	<a href="#"><u>LOG-IN TO COMPLETE</u></a>	<a href="#"><u>ADDITIONAL INFORMATION</u></a>  Continuing Medical Education Office 362-6891
Working with a <b>gamma irradiator</b>	Irradiator Exam and training	An individual needing to use a self-shielded gamma irradiator at Washington University and the Medical Center should contact Radiation Safety for information on the process, security requirements, and alternatives.	<ol style="list-style-type: none"> <li>1. Formal request by individual's Authorized User or Department</li> <li>2. Successfully pass a background check including fingerprinting &amp; FBI criminal history records check</li> <li>3. Irradiator Exam</li> <li>4. Facility Training</li> <li>5. Operator Training</li> <li>6. IC Program Didactic Security Training</li> <li>7. IC Program Hands-on Security Training</li> <li>8. Annual Refresher Training is also required.</li> </ol>	Initially: 2 to 6 months for background check  6 to 8 hours spread over 4 to 6 weeks for exam & training  Annually: 1 hour	Phone (362-3476) or email <a href="mailto:radsafety@wustl.edu"><u>radsafety@wustl.edu</u></a>	Radiation Safety 362-3476
Research involving <b>human subjects</b>	HRPO Protocol Submission	Studies which need IRB approval should be submitted to the Human Research Protection Office.	<ol style="list-style-type: none"> <li>1. Download appropriate form from HRPO's Website</li> <li>2. Complete the form and submit it to the HRPO Office</li> <li>3. Complete Human Subjects Training</li> </ol>	.5 – 2 Hours	<a href="#"><u>HRPO FORMS</u></a>	<a href="#"><u>ADDITIONAL INFORMATION</u></a>  Human Research Protection Office 633-7400

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Research involving <b>human subjects</b>	Human Subjects Research Training Module (CITI)	School of Medicine researchers will need to complete the Biomedical Investigation track. Danforth Campus Researchers will need to complete either: 1. Researchers in Social Work, Anthropology, Economics, Education, Political Science, Psychology, Program in Philosophy, Neuroscience & Psychology, Program in Social Thought and Analysis or 2. All other Danforth Depts./Schools	<ol style="list-style-type: none"> <li>1. Click on the link provided to the right</li> <li>2. Enter your employee ID number and AIS/HRMS password (or your WUSTL Key)</li> <li>3. Click on Human Subjects Education on the left side of the screen</li> <li>4. Follow the instructions provided</li> </ol>	2 - 4 Hours One-Time Only	<b><u>LOG-IN TO TAKE TRAINING</u></b>	<b><u>ADDITIONAL INFORMATION</u></b>  Human Research Protection Office 633-7400
Working in a <b>laboratory setting</b>	EH&S Annual Lab Safety Training	WU laboratory and clinical faculty, staff, and students working in laboratories are required to have annual training covering OSHA and EPA topics.	<ol style="list-style-type: none"> <li>1. Click on the link provided on the right and choose which option best suites your situation</li> <li>2. If choosing On-Line Training, enter your employee ID number and AIS/HRMS password (or your WUSTL Key)</li> <li>3. Click Breeze Training on the left side of the screen, then follow the instructions provided</li> </ol>	2 Hours Annually	<b><u>INFORMATION ON TRAINING</u></b>	<b><u>ADDITIONAL INFORMATION</u></b>  Environmental Health and Safety 935-9264
Working with <b>lasers</b>	Confirm that Radiation Safety has the machine on its inventory list	To notify Radiation Safety of the presence of the machine, to ensure it is placed on the inspection schedule, and confirm that the PI has safety program implemented.	<ol style="list-style-type: none"> <li>1. Complete <u>inventory form</u> and submit to Radiation Safety</li> <li>2. Annual safety audit</li> </ol>	Initially: 0.5 hour  Annually: 1 hour audit	Submit <u>laser inventory form</u> to Radiation Safety by fax at 362-4776, email attachment to <u>radsafety@wustl.edu</u> , or Campus Mail box 8053.	<b><u>ADDITIONAL INFORMATION</u></b>  Radiation Safety 362-3476
Working with strong <b>magnetic fields</b>	Confirm that Radiation Safety has the machine on its inventory list	To notify Radiation Safety of the presence of the machine, ensure it is placed on the inspection schedule, and confirm that the PI has safety program implemented.	<ol style="list-style-type: none"> <li>1. Submit <u>inventory form</u>.</li> <li>2. Annual safety audit</li> </ol>	Initially: 0.5 hour  Annually: 1 hour audit	Submit <u>inventory form</u> to Radiation Safety by fax at 362-4776, email attachment to <u>radsafety@wustl.edu</u> , or Campus Mail box 8053.	Radiation Safety 362-3476
Provide <b>patient care</b> or clinical lab services	Office of Physician Billing Compliance – Billing Compliance 101	Employees (faculty physicians, fellows, and staff) must participate annually in billing compliance education if they are involved in patient care services, and/or if they are involved directly or indirectly in the professional reimbursement process.	<ol style="list-style-type: none"> <li>1. Click on the link provided on the right,</li> <li>2. Enter your employee ID number and AIS/HRMS password (or your WUSTL Key)</li> <li>3. Click Breeze Training on the left side of the screen, then follow the instructions provided</li> </ol>	1 Hour Annually	<b><u>LOG-IN TO TAKE TRAINING</u></b>	<b><u>ADDITIONAL INFORMATION</u></b>  Office of Physician Billing Compliance 747-7661

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Activity	Requirement	Reason for Requirement	Necessary Steps to Fulfill Requirement	Estimated Time Requirement	To Fulfill the Requirement	For More Information
Provide <b>patient care</b> or clinical lab services	EH&S Annual Clinical Safety Training	WU laboratory and clinical faculty, staff, and students working in laboratories are required to have annual documented training covering OSHA and EPA topics.	<ol style="list-style-type: none"> <li>Click on the link provided on the right and choose which option best suites your situation</li> <li>If choosing On-Line Training, enter your employee ID number and AIS/HRMS password (or your WUSTL Key)</li> <li>Click Breeze Training on the left side of the screen, then follow the instructions provided</li> </ol>	2 Hours Annually	<b><u>INFORMATION ON TRAINING</u></b>	<b><u>ADDITIONAL INFORMATION</u></b>  Environmental Health and Safety 935-9264
	Risk Management Patient Safety Training	The MedRisk training program provides risk prevent skills training specific to a physician's specialty or area of interest	<ol style="list-style-type: none"> <li>Follow link to the MedRisk welcome page.</li> <li>Register by using your Employee ID as your username and establish a password of your choice.</li> <li>Choose course and follow directions provided.</li> </ol>	2-4.5 Hours One-Time Only	<b><u>LOG IN TO TAKE TRAINING</u></b>	Risk Management Elaine Cooper 362-4645
Working with <b>positron emitting radioactive materials</b> (PET isotopes)	PET Safety Exam and training to qualify as PET Worker	Ensure training and regulatory compliance for personnel working in positron emission tomography (PET) facilities, cyclotron facilities, or PET radiochemistry laboratories.	<ol style="list-style-type: none"> <li>Qualify as Radiation Worker, below.</li> <li>For initial training, download the <a href="#">training manual</a>.</li> <li>Call or email Radiation Safety to schedule an appointment to take the PET Safety Exam (362-3476 or <a href="mailto:radsafety@wustl.edu">radsafety@wustl.edu</a>)</li> <li>Annual Refresher Training is also required.</li> </ol>	2 hour initially  1 hour annually	<b><u>INFORMATION ON TRAINING</u></b>	<b><u>FREQUENTLY ASKED QUESTIONS</u></b>  Radiation Safety 362-3476
Access to <b>Protected Health Information (PHI)</b>	HIPAA Training	HIPAA training is required for everyone who accesses PHI.  *Annual refresher training, while not mandated by the University, is mandatory for some departments. Please contact your Department Administrator for further information.	The HIPAA Privacy Liaison for your department will e-mail you with a log-in, password, and instructions for the HIPAA training system.	1 -1.5 Hours One-Time Only*	<b><u>LOG-IN TO TAKE TRAINING</u></b>	<b><u>ADDITIONAL INFORMATION</u></b>  Privacy Office 747-4975
Working with <b>radioactive materials</b>	Radiation Safety Exam and training to qualify as Radiation Worker	Ensure training and regulatory compliance for personnel prior to working with radioactive materials	<ol style="list-style-type: none"> <li>For initial training, download the <a href="#">training manual</a>.</li> <li>Call or email Radiation Safety to schedule an appointment to take the Radiation Safety Exam (362-3476 or <a href="mailto:radsafety@wustl.edu">radsafety@wustl.edu</a>)</li> <li>Annual Refresher Training is also required.</li> </ol>	2 hour initially  1 hour annually	<b><u>INFORMATION ON TRAINING</u></b>	<b><u>FREQUENTLY ASKED QUESTIONS</u></b>  Radiation Safety 362-3476

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Faculty Principal Investigator needing to use <b>radioactive materials</b> (may include PET) in non-human research	Approval to possess and use radioactive materials as Authorized User, for non-human research.	Ensure training and experience and regulatory compliance for Radiation Safety Committee approval of Authorized Users.	<ol style="list-style-type: none"> <li>1. Qualify as Radiation Worker or PET Worker as appropriate, above</li> <li>2. Document more than 40 hours of training and relevant hands-on experience with radioactive materials (<b>T&amp;E Form</b>).</li> <li>3. Submit an <b>Application</b>.</li> <li>4. Participate in an Authorized User interview.</li> </ol>	<p>Initially: 1 hour for form and application</p> <p>2 to 4 weeks for review and approval</p> <p>Approval lasts 2 to 5 years</p>	Submit a <b>T&amp;E Form</b> and an <b>Application</b> to Radiation Safety by fax at 362-4776, email attachment to <a href="mailto:radsafety@wustl.edu">radsafety@wustl.edu</a> , or Campus Mail box 8053.	<b>ADDITIONAL INFORMATION</b>  Radiation Safety 362-3476
Research that employs: <b>recombinant</b> DNA, biological toxins, infectious microorganisms, potentially infectious cell lines, animal or human tissues or fluids	IBC Protocol	This form provides OBCS and the Institutional Biological and Chemical Safety Committee a detailed description of regulated or hazardous research elements and their management, providing a basis for risk assessment.	<ol style="list-style-type: none"> <li>1. Download appropriate form from the link to the right</li> <li>2. Complete the form and submit it to the Office of Biological and Chemical Safety, Environmental Health and Safety Office</li> </ol>	<p>2 - 4 Hours</p> <p>IBC approval is valid for 5 years.</p>	<b>IBC FORM</b>	<b>ADDITIONAL INFORMATION</b>  Institutional Biological & Chemical Safety Committee 362-6816
Working with <b>Select Agents</b> or Toxins	Select Agent Registration and Education	Federal regulations require that anyone working with Select Agents or Toxins be registered with and approved by CDC.	<ol style="list-style-type: none"> <li>1. Contact the Biosafety Officer to initiate the approval process.</li> <li>2. Obtain Security Risk Assessment from FBI/CJIS/CDC (involves fingerprinting and criminal background check).</li> <li>3. Select Agent security and safety training is required before beginning work.</li> <li>4. Select Agent security and safety refresher training is required annually.</li> </ol>	1 Hour Annually	Please contact Biosafety Officer (747-0309, <a href="mailto:shcook@wustl.edu">shcook@wustl.edu</a> ).	<b>ADDITIONAL INFORMATION</b>  Biosafety Officer 747-0309
<b>Shipping</b> potential infectious materials	EH&S DOT/IATA Infectious Shipping Training	Anyone shipping dangerous goods (such as infectious, biological, chemical or radioactive materials) is required to receive Department of Transportation (DOT)/International Air Transport Association (IATA) training.	<ol style="list-style-type: none"> <li>1. Follow the link on the right for information regarding classroom training opportunities</li> <li>2. Pick the date and location which is most convenient</li> <li>3. Complete and submit the registration form</li> </ol>	<p>3 - 4 Hours</p> <p>Every 2 years</p> <p>Research requires both Category A &amp; B while Clinical only requires Category B training.</p>	<b>INFORMATION ON TRAINING</b>	<b>ADDITIONAL INFORMATION</b>  Environmental Health and Safety 935-9264
Working with an <b>x-ray</b> machine, electron microscope, or other x-ray producing machine	Confirm that Radiation Safety has the radiation machine on the State Registration	To notify Radiation Safety of the presence of the radiation machine and to ensure it is properly registered with the State, is placed on the inspection schedule, and confirm that the PI has safety program implemented.	<ol style="list-style-type: none"> <li>1. Submit <b>inventory form</b>.</li> <li>2. Annual safety audit</li> </ol>	<p>Initially: 0.5 hour</p> <p>Annually: 1 hour audit</p>	Submit <b>inventory form</b> to Radiation Safety by fax at 362-4776, email attachment to <a href="mailto:radsafety@wustl.edu">radsafety@wustl.edu</a> , or Campus Mail box 8053.	<b>ADDITIONAL INFORMATION</b>  Radiation Safety 362-3476

**NOT REQUIRED, BUT USEFUL:**

Activity	Requirement	Reason for Requirement	Necessary Steps to Fulfill Requirement	Estimated Time Requirement	To Fulfill the Requirement	For More Information
New Faculty	New Faculty Orientation			4 Hours	<u><b>NEW FACULTY ORIENTATION INFORMATION</b></u>	<u><b>WUSM HR</b></u> 362-7196 <u><b>DANFORTH CAMPUS HR</b></u> 935-5990