

DISCLOSURE OF FINANCIAL CONFLICT OF INTEREST

PROJECT:

DATE :

As of October 1, 1995, new federal regulations require that the university manage, reduce, or eliminate any actual or potential conflicts of interest that may be presented by the compensated outside activities and other financial interests of persons involved in sponsored research projects funded by the **Public Health Service (PHS)** and the **National Science Foundation (NSF)**. The primary purpose of the federal regulations is to prevent bias in the design, conduct, or reporting of research projects. Principal investigators and others working on projects funded by the PHS or the NSF must abide by these requirements.

Any employee submitting a grant or contract proposal to the Public Health Service or the National Science Foundation through the university or conducting research or educational activities pursuant to such a federal grant or contract at the university as an "investigator" must report any "Significant Financial Interest" that would reasonably appear to be affected by the proposed or funded research activities, including interests maintained in entities that would be so affected. An "investigator" is defined as the principal investigator, co-principal investigator, or any other employee responsible for the design, conduct, or reporting the proposed or funded research or educational activities. For the purpose of determining a Significant Financial Interest, an "investigator" also includes an employee's spouse and dependent children.

A "Significant Financial Interest" refers to: salary or other payments for services, such as consulting fees and honoraria; equity interests, such as stocks and stock options; and intellectual property rights, such as patents, copyrights, and royalties. A Significant Financial Interest does not refer to salary or other remuneration from the university; income derived from seminars, lectures or teaching engagements sponsored by public or nonprofit entities; income derived from service on advisory committees or review panels for public or nonprofit entities; or salary, royalties or other payments that, when aggregated for the investigator and his or her spouse and dependent children, is not expected to exceed \$10,000 over a 12 month period. An equity interest that, when aggregated for the investigator, spouse, and dependent children, does not exceed \$10,000 and does not represent more than a five percent ownership interest in any entity is also not considered a Significant Financial Interest. Significant Financial Interests must be disclosed at the time of the submission of the proposal, but approval of the outside activities and financial interests (with conditions if warranted) need not occur until the project has been funded. The federal regulations also require that the disclosures be made annually during the course of the research or as new reportable significant financial interests are obtained. The employee must file a new report if a new Significant Financial Interest is obtained, which is consistent with the university's requirement that any material changes to outside activities and financial interests must be reported during the academic year. Review and approval or disapproval of the interests disclosed during the course of a research project must be accomplished within 60 days.

The department chairperson (or supervisor) and the dean (or director) are responsible for reviewing each disclosure to determine if there is a conflict of interest. Under the federal regulations, if a Significant Financial Interest may directly and significantly affect the design, conduct, or reporting of the research a conflict will be deemed to exist. The university, through the department chairperson (or supervisor) and dean (or director), is required to manage, reduce or eliminate the conflict. Conditions that might be imposed in such cases include public disclosure of the conflict, modification of the research design, or monitoring of the research by independent reviewers. If adequate measures are not feasible, the employee may have to discontinue the compensated activities or divest himself or herself of the financial interest, or discontinue the research. The employee must abide by the conditions under which the research is permitted.

For further information with regard to federal contract and grant requirements, please contact the office of Research and Graduate Programs at 392-1582.

I declare that under the Federal Regulations described above: (Please print your name under signature.)

I **DO NOT** have a significant financial interest that would reasonably appear to be affected by the proposed research activities.

I **DO** have a significant financial interest that would reasonably appear to be affected by the proposed research activities.

Principal Investigator (print)

Principal Investigator (print)

Co-Principal Investigator (print)

Co-Principal Investigator (print)

Key Personnel (print)

Key Personnel (print)