**SUSTAINABLE SCIENCES INSTITUTE (SSI)**

**FINANCIAL CONFLICT OF INTEREST (FCOI) POLICY**

**PURPOSE**

A financial conflict of interest (FCOI) in research is a situation in which an objective layperson might perceive that an individual’s financial relationships may compromise the individual’s professional judgment in conducting, analyzing, or reporting research. For example, an investigator may have a financial conflict of interest if he or she is a consultant to the company sponsoring research in his or her laboratory. Another example is an investigator who owns significant equity in a company whose product he or she wants to test.

To better determine whether a FCOI exists, the National Institutes of Health (NIH) and the Public Health Service (PHS) adopted new regulations in 2011 expanding grant recipients’ responsibilities for collecting information related to investigators’ financial interests. (<http://grants.nih.gov/grants/policy/coi/coi_faqs.htm#3165>)

Investigators are required to report all “Significant Financial Interests” that have monetary value, whether or not the value is readily ascertainable.

 “Significant Financial Interest” is defined as: 1) any remuneration from a publicly-traded entity in the 12 months preceding financial disclosure and any equity interest owned or acquired as of the date of disclosure which exceeds $5,000 when aggregated for the investigator, spouse, registered domestic partner or dependent children; 2) the value of any remuneration received from a non publicly-traded entity which when aggregated exceeds $5,000; 3) any equity interest held in a non publicly-traded entity by the investigator, spouse, registered domestic partner or dependent children regardless of value; 4) any payments exceeding $5,000 received within the past 12 months for any intellectual property interests assigned or licensed to any party other than SSI; 5) any travel reimbursement or payment in excess of $5,000 per entity made by any entity THAT IS NOT a U.S. Federal, state, or local government agency, institution of higher education, academic teaching hospital, medical center, or research institute affiliated with a U.S. institute of higher education.

To facilitate reporting of Significant Financial Interests, SSI requires all PIs, Co-PIs and Senior Personnel – individuals "responsible for the design, conduct or reporting" of research – to do the following:

1) Complete a FCOI Disclosure Form by June 30 of each year;

3) Complete a FCOI Disclosure Form within 30 days of acquiring or discovering a new significant financial interest;

4) Complete the NIH online FCOI tutorial and provide a certificate of completion once every 4 years;

Tutorial Link: http://grants.nih.gov/grants/policy/coi/tutorial2011/fcoi.htm

5) Complete the Travel Disclosure Form to report travel payments of more than $5,000 made by any single non-governmental and non-academic entity as specified in regulations.

Investigators with “Yes” responses on the Financial Disclosure Form must file a more in-depth form. This form must be completed annually in conjunction with the progress report.

These requirements also apply to investigators funded by any other agency or organization that follows Public Health Service disclosure requirements.

These requirements also apply to investigators related to any subcontracts or subawards granted by SSI.

The board-approved SSI Compliance Committee will review all financial disclosures where the disclosed financial interest is related to the work of SSI and will take any necessary steps to manage, reduce, or eliminate any conflicts of interest in accordance with regulations. Approval is required before any awards are executed.

See NIH requirements for more information:

<http://grants.nih.gov/grants/policy/coi>

**Principal Investigator Certification**

**I certify that:**

All individuals responsible for the design, conduct or reporting of research on existing awards and funded projects for which I am PI have submitted to SSI a FCOI Disclosure Form within the past year, and a FCOI Training Certificate with the past four years.

Any new investigator responsible for the design, conduct or reporting of research who joins a project for which I am PI will submit a FCOI Disclosure Form and current (less than 4 years old) FCOI Training Certificate within 30 days of participating in the project.

An investigator who discloses a FCOI with a funded project for which I am PI will not participate in the design, conduct or reporting of research until the SSI Compliance Committee investigates and approves this investigator’s participation.

Should I wish to establish a subagreement with a subrecipient that does not have an acceptable FCOI policy, then I will:

1) submit to SSI a FCOI Disclosure Form for each investigator who will be involved in the subrecipient’s scope of work prior to the establishment of the subagreement or any supplements that extend the project end date;

2) submit to SSI a FCOI Training Certificate dated within the last four years for each investigator who will be involved in the subrecipient’s scope of work prior to the establishment of the subagreement or any supplements that extend the project end date;

I will maintain a file of current (less than 4 years old) FCOI Training Certificates for all SSI investigators, and for all investigators of any subrecipient that does not have an acceptable FCOI policy, for as long as each investigator is involved in the project, and will make this information available upon request.

Signature of Principal Investigator: \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

Date: \_\_\_\_\_\_\_\_\_\_\_\_

**SSI Financial Conflict of Interest Disclosure Form**

**Section 1: Project Information**

Principal Investigator: \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

Email Address: \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

Project Start Date: \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ Project End Date: \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

Project Title: \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

Sponsor: \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

**Section 2: Type of Proposal/Disclosure (check one)**

 \_\_\_ New Proposal

\_\_\_ Supplemental Funding With Time Extension

\_\_\_ Change of Grantee Institution

\_\_\_ Annual Reporting/Non-Competing Continuation

\_\_\_ Renewal/Competing Continuation

\_\_\_ No-Cost Time Extension

\_\_\_ Renewal/Competing Continuation

\_\_\_ New Investigator Added to Project

**Section 3: Principal Investigator Disclosure**

**1. Publicly Traded Entity**

Have you, your spouse or domestic partner, and/or dependent children received income or payment for services in the past 12 months or own equity interest in any publicly traded entity related to your institutional responsibilities exceeding $5,000 when aggregated? This does not include interests in mutual funds and retirement funds in which you do not directly control investment decisions.

\_\_\_ Yes

\_\_\_ No

**2. Non-Publicly Traded Entity**

Have you, your spouse or domestic partner, and/or dependent children received income or payment for services in the past 12 months, exceeding $5,000 when aggregated, from any non-publicly traded entity? This does not include income from seminars, lectures, or teaching engagements sponsored by a federal, state, or local US government agency, a US institution of higher education or an affiliated research institute, an academic teaching hospital, or a medical center.

\_\_\_ Yes

\_\_\_ No

**3. Equity interests**

Do you, your spouse or domestic partner, and/or dependent children currently own, or have acquired in the past 12 months, any equity interest in any non-publicly traded entity related to your institutional responsibilities? This can include any stock, stock option, or other ownership interest.

\_\_\_ Yes

\_\_\_ No

**4. Intellectual Property and Interests**

Have you, your spouse or domestic partner, and/or dependent children received payments, in the past 12 months, for any intellectual property rights and interests (e.g. patents, copyrights, assigned or licensed to a party other than SSI) exceeding $5,000 related to your institutional responsibilities?

\_\_\_ Yes

\_\_\_ No

**5. Travel Reimbursement/Sponsorship**

Have you received a travel reimbursement or been sponsored for travel (i.e. travel expenses paid on behalf of the investigator and not reimbursed to the investigator) in excess of $5,000 per entity in the 12 months prior to disclosure, by any entity related to your institutional responsibilities? This does not include travel sponsored or reimbursed by US federal, state, or local US government agencies, a US institution of higher education or an affiliated research institute, an academic teaching hospital, or a medical center.

\_\_\_ Yes

\_\_\_ No

**Section 4: Principal Investigator Acknowledgement and Certification**

I certify under penalty of perjury that this is a complete disclosure of all my significant interests related to my institutional responsibilities and I have used all reasonable diligence in preparing this Financial Interest Disclosure, and to the best of my knowledge it is true and complete. I also acknowledge that by signing my name below that it is my responsibility to disclose, within 30 days, any new significant financial interests obtained during the terms of the above proposed project.

Signature of PI \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

Date \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

Printed Name \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

Attach additional sheets as required to identify and include financial disclosure information for all project investigators.