### SFI Disclosure Form for PHS-Funded Investigators

Investigators engaged in, or planning to engage in, PHS-funded research activity are required to disclose to the Office of Research Administration, per the schedule below, any **significant financial interests (SFI) related to the investigator’s institutional responsibilities**. The requirement for disclosure of SFI applies to all persons engaged in PHS-funded research activity as “investigators,” and includes (in aggregate) the financial interest of their spouses and/or dependent children. Investigators involved with research collaborators, sub-grantees, subcontractors or consultants must take reasonable steps to ensure compliance with the final rule, and compliance with any applicable management plans established by OU. Disclosures are to be made via the “SFI Disclosure Form for PHS-Funded Investigators.”

SFI’s are required to be disclosed at the following time points:

* No later than at the time of application for PHS-funded research; and
* At least annually, regardless of any changes, during the period of award; and
* No later than 30 days after discovering or acquiring a new SFI at any point in the research process.

It is the investigator’s responsibility to comply with these rules and to submit the completed forms to ORA in a timely manner that is compliant with the timeline above. Completed forms must be provided to ORA via hand-delivery or e-mail FCOI@oakland.edu.

Date:

Investigator’s name:

Investigator’s title at Oakland University:

Investigator’s e-mail at OU:

Phone number:

Title of project:

PHS sponsor (e.g., NICHD):

PHS grant number:

Starting date of project:

End date of project:

Investigator’s role on project (provide general role, such as “Principal Investigator” or “Key Personnel,” and then explain what you will be doing on the project, in a single paragraph):

List sub-recipients, or “none”:

### Disclosure of Significant Financial Interests (SFI)

SFI means a financial interest consisting of one or more of the following interests of the investigator (including those of the Investigator's spouse and/or dependent children, in aggregate) that reasonably appear to be related to the Investigator's *institutional responsibilities*. Note that you are being asked about all SFI related to your responsibilities at OU, not just financial interests that may be related to the PHS-funded project. Answer all of the questions below for each category of SFI, and then complete the table:

1. With regard to any **publicly traded entity**, a significant financial interest exists if the value of any remuneration received from the entity in the twelve months preceding the disclosure and the value of any equity interest in the entity as of the date of disclosure, when aggregated, exceeds $5,000. *Check all of the following that apply with regard to category #1:*

[ ]  I personally have no SFI to disclose in this category.

[ ]  My immediate family members have no SFI to disclose in this category.

[ ]  I personally have SFI to disclose in this category. *(List in table on pg. 5)*

[ ]  My immediate family members have SFI to disclose in this category. *(List in table on pg. 5)*

1. **Remuneration** that includes salary and any payment for services not otherwise identified as salary (e.g., consulting fees, honoraria, paid authorship); equity interest includes any stock, stock option, or other ownership interest, as determined through reference to public prices or other reasonable measures of fair market value. *Check all of the following that apply with regard to category #2:*

[ ]  I personally have no SFI to disclose in this category.

[ ]  My immediate family members have no SFI to disclose in this category.

[ ]  I personally have SFI to disclose in this category. *(List in table on pg. 5)*

[ ]  My immediate family members have SFI to disclose in this category. *(List in table on pg. 5)*

1. With regard to any **non-publicly traded entity**, a significant financial interest exists if the value of any remuneration received from the entity in the twelve months preceding the disclosure, when aggregated, exceeds $5,000, or when the Investigator (or the Investigator's spouse and/or dependent children) holds **any** equity interest (e.g., stock, stock option, or other ownership interest). *Check all of the following that apply with regard to category #3:*

[ ]  I personally have no SFI to disclose in this category.

[ ]  My immediate family members have no SFI to disclose in this category.

[ ]  I personally have SFI to disclose in this category. *(List in table on pg. 5)*

[ ]  My immediate family members have SFI to disclose in this category. *(List in table on pg. 5)*

1. **Intellectual property** rights and interests (e.g., patents, copyrights), upon receipt of income that exceeds $5,000 related to such rights and interests. *Check all of the following that apply with regard to category #4:*

[ ]  I personally have no SFI to disclose in this category.

[ ]  My immediate family members have no SFI to disclose in this category.

[ ]  I personally have SFI to disclose in this category. *(List in table on pg. 5)*

[ ]  My immediate family members have SFI to disclose in this category. *(List in table on pg. 5)*

**Travel:** Investigators also must disclose the occurrence of any sponsored or funded travel (there is no minimum threshold) related to their institutional responsibilities. This disclosure requirement applies to travel expenses that are paid on behalf of, or reimbursed to, the investigator by any for-profit or not-for-profit entity. This does not apply to travel that is reimbursed or sponsored by a federal, state, or local government agency, an institution of higher education, an academic teaching hospital, a medical center, or a research institute that is affiliated with an institution of higher education. Although the exact monetary value may not be readily available, OU may request more information during its review of the disclosure. If you have more than one disclosure for travel, attach additional pages. Answer all of the questions below:

* Purpose of the trip:
* Identity of the sponsor/organizer:
* Destination:
* Duration of the trip (give dates of travel):

Do you believe that the travel meets the definition of a financial conflict of interest with the PHS-funded research? [ ]  Yes [ ]  No

Provide a rationale for your answer:

**APPROVAL**

The **Chair of your Department, Director of your Center or Institute, or your Dean**, must also review your travel disclosure and answer this question:

Do you believe that the investigator’s travel meets the definition of a financial conflict of interest with the PHS-funded research?

[ ]  I agree [ ]  I do not agree

Provide a rationale for your answer:

Please sign by typing your name:

**Exclusions -** SFI does not include the following types of financial interests:

* Salary, royalties, or other remuneration paid by OU to the investigator if the investigator is currently employed or otherwise appointed by OU, including intellectual property rights assigned to the university and agreements to share in royalties related to such rights;
* Income from investment vehicles, such as mutual funds and retirement accounts, so long as the investigator does not directly control the investment decisions made in these vehicles;
* Income from seminars, lectures, or teaching engagements sponsored by a federal, state, or local government agency, an institution of higher education [as defined at 20 U.S.C. 1001(a)], an academic teaching hospital, a medical center, or a research institute that is affiliated with an institution of higher education; or
* Income from service on advisory committees or review panels for a federal, state, or local government agency, an Institution of higher education, an academic teaching hospital, a medical center, or a research institute that is affiliated with an institution of higher education.

**Table: SFI disclosures for PHS funded research**

**Instructions:** For each category described above, for which you indicated that you and/or your immediate family (in aggregate) **have SFI related to your institutional responsibilities** at OU, provide the dollar amount of your SFI in the column under the appropriate dollar range (e.g. if you have SFI in the amount of $6,500 in category #1, enter this amount in the column marked “$5,000-$9,999”). Then provide your opinion about whether the SFI is related to the PHS-funded research project. If you need more rows for your disclosures, attach additional copies of the table.

|  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- |
| Category | $5,000-$9,999 | $10,000-$19,999 | $20,000-$100,000 | >$100,000 | **Other\*** | Related to PHS-Funded Project? |
| Yes | No |
| 1Publicly Traded Entities |       |       |       |       | [ ]  | [ ]  | [ ]  |
|       |       |       |       | [ ]  | [ ]  | [ ]  |
|       |       |       |       | [ ]  | [ ]  | [ ]  |
|       |       |       |       | [ ]  | [ ]  | [ ]  |
| 2Remuneration |       |       |       |       | [ ]  | [ ]  | [ ]  |
|       |       |       |       | [ ]  | [ ]  | [ ]  |
|       |       |       |       | [ ]  | [ ]  | [ ]  |
|       |       |       |       | [ ]  | [ ]  | [ ]  |
| 3Non-Publicly Traded Entities |       |       |       |       | [ ]  | [ ]  | [ ]  |
|       |       |       |       | [ ]  | [ ]  | [ ]  |
|       |       |       |       | [ ]  | **[ ]** [ ]  | [ ]  |
|       |       |       |       | [ ]  | [ ]  | [ ]  |
| 4Intellectual Property |       |       |       |       | [ ]  | [ ]  | [ ]  |
|       |       |       |       | [ ]  | [ ]  | [ ]  |
|       |       |       |       | [ ]  | [ ]  | [ ]  |
|       |       |       |       | [ ]  | [ ]  | [ ]  |

**\*Other:** Put a check in this column if the interest is one whose value cannot be readily determined through reference to public prices or other reasonable measures of fair market value, or if the interest is one that does not have a minimum threshold per the final rule.

**Comments that you think would be helpful to the FCOI reviewer:**

As Investigator, I certify that all information provided in this Disclosure Form for PHS is complete and accurate.

|  |  |
| --- | --- |
| Your name: |  |
| Today's date: |  |