CHICAGO STATE UNIVERSITY

CHICAGO STATE UNIVERSITY (CSU)
FINANCIAL CONFLICT OF INTEREST (FCOI) DISCLOSURE FORM INSTRUCTIONS

Step 1: Investigator Must Determine their *Institutional Responsibilities*:

The Investigator must determine the professional activities they perform on behalf of the Institution (e.g., the a*pplicant and/or recipient institution*). See your institution's definition of "Institutional responsibilities" in its FCOI policy. Activities may include research, research consultation, fundraising, product or services development, product testing, teaching, professional practice, institutional committee membership, and service on panels such as Institutional Review Boards or Data Safety and Monitoring Boards.

Step 2: Investigator must determine and disclose all domestic and foreign (non-United States) Significant Financial Interests (SFIs) (including those of their spouse, domestic partner, and dependent children) that reasonably appear to be related to the Investigator's *Institutional Responsibilities* received from or held in entities *outside* the applicant and/or recipient institution:

> **NOTE**: **Do not** limit SFI disclosure to the Investigator's "research" activities nor the funded research. The 2011 regulation results in the disclosure by Investigators to Institutions of a wider array of interests. The Institution is responsible for determining whether a disclosed SFI relates to PHS-funded research and whether it constitutes an FCOI as described below.

Subrecipient Investigator Disclosure – Subrecipient Investigators who utilize the recipient's policy, are required to disclose their SFI related to the subrecipient's work for the recipient.

Investigators are not required to disclose the following financial interests:

- Salary, royalties, or other remuneration paid by the Institution (i.e., grant recipient) to the Investigator if the Investigator is currently employed or otherwise appointed by the Institution, including intellectual property rights assigned to the Institution and agreements to share in royalties related to such rights;
- Any ownership interest in the Institution held by the Investigator, if the Institution (i.e., grant recipient) is a commercial or for-profit organization (This exclusion applies only if the applicant or recipient (including a sub-recipient) is a for-profit or commercial institution);
- Income from investment vehicles, such as mutual funds and retirement accounts, as 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 located in the United States, a United States Institution of higher education, an academic teaching hospital, a medical center, or a research institute that is affiliated with a United States Institution of higher education; or
- Income from service on advisory committees or review panels for a federal, state, or local government agency located in the United States, a United States Institution of higher education, an academic teaching hospital, a medical center, or a research institute that is affiliated with a United States Institution of higher education.
- Reimbursed or sponsored travel received from a federal, state, or local government agency located in the United States, a United States Institution of higher education, an academic teaching hospital, a medical center, or a research institute that is affiliated with a United States Institution of higher education.

Step 3: The institution's designated official(s) (DO) will review each SFI to determine if the SFI is related to the funded research and is an FCOI. The review should be documented to show that the Institution fulfilled its responsibility to review the SFI disclosure. The documentation of whether an FCOI is determined or not will be part of the Institution's internal records.

> The SFI is related to the research when the DO determines the SFI*: 1) could be affected by the funded research or 2) is in an entity whose financial interest could be affected by the funded research*. If the SFI is related to the research, an FCOI exists when the DO determines *the SFI could directly and significantly affect the design, conduct or reporting of the funded research* (note: "significantly" means the financial interest would have a material effect on the research). If an FCOI is identified, a management plan will be implemented to protect the design, conduct and reporting of funded research from bias resulting from an Investigator's FCOI. Copies of management plan should be retained in the Institution's records. Only identified FCOIs are reported to the funding agency. If an FCOI is not identified, no reporting is required.

CHICAGO STATE UNIVERSITY

CHICAGO STATE UNIVERSITY (CSU) FINANCIAL CONFLICT OF INTEREST (FCOI) FORM

Principal Investigator's Name (if different from Investigator): _____

Funding agency, Grant Application or Grant Number(s): _____

Role on the Project(s): _____

Project Dates: _____

Project Title(s): _____

Name of funder (e.g., National Institutes of Health): _____

☐ **INITIAL DISCLOSURE** ☐ **ANNUAL DISCLOSURE** ☐ **NEW SFI DISCLOSURE**

Definitions	
Remuneration	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 options, or other ownership interest as determined through reference to public prices or other reasonable measures of market value.
Intellectual property rights and interests (e.g., patents, copyrights)	Upon receipt of income related to such rights and interests (e.g., royalties) not from the recipient Institution.
Institutional Responsibilities	The professional responsibilities of an Investigator on behalf of CSU, which may include activities such as teaching, mentoring, research, research consultation and collaboration, product development, product testing and validation, development of datasets, models, or systems, publication and communication of research results, and other professional services performed on behalf of CSU.

To promote objectivity of funded research and preserve the public's trust that the research supported by the Federal Funds is conducted without bias and with the highest scientific and ethical standards, Investigators are required to disclose their "Significant Financial Interests" as described below.

Disclose all domestic and foreign Significant Financial Interests (SFI) (including those of your spouse and dependent children) that reasonably appear to be related to your **institutional responsibilities** (i.e., SFI disclosure is not limited to your research responsibilities nor your funded research) per the categories and dollar thresholds provided below:

1. **SFIs RELATED TO A PUBLICLY TRADED ENTITY** – Have you, your spouse and dependent children received any *remuneration* over the preceding 12 months and hold any *equity interest* in a publicly traded entity as of the date of disclosure, that when the values are aggregated, exceeds $5,000?

   If "yes," provide the following information for each entity in which an SFI is identified or indicate that No SFI(s) exists:

   - The Value of SFI or indication that value cannot be readily determined: _____
   - Entity Name as it appears on the entity's public website: _____
   - Nature of the SFI (e.g., salary, consulting fees, honorarium, paid authorship, payment for services, equity interest, etc.): _____
   - No SFI(s) exist under this category _____

2. **SFI RELATED TO A NON-PUBLICLY TRADED ENTITY** – Have you, your spouse and dependent children received any *remuneration* over the preceding 12 months that *exceeds $5,000* and hold *any equity interest* in a non-publicly traded entity as of the date of disclosure?

   If "yes," provide the following information for each entity in which an SFI is identified or indicate that No SFI(s) exists:

   - The Value of SFI or indication that value cannot be readily determined: _____
   - Entity Name as it appears on the entity's public website: _____

- Nature of the SFI (e.g., salary, consulting fees, honorarium, paid authorship, payment for services, equity interest, etc.): _____
- No SFI(s) exist under this category _____

3. **SFI RELATED TO INTELLECTUAL PROPERTY (IP) RIGHTS AND INTERESTS** – Have you, your spouse and dependent children received any income *greater than $5,000* over the preceding 12 months that is related to **intellectual property rights and interests** (e.g., patents, copyrights) from an entity other than the applicant and/or recipient institution?

If "yes," provide the following information for each entity in which an SFI is identified or indicate that No SFI(s) exists:

- The Value of SFI or indication that value cannot be readily determined _____
- Entity Name as it appears on the entity's public website: _____
- Nature of the SFI (e.g. royalties, licensing fees) _____
- No SFI(s) exist under this category _____

4. **SFI RELATED TO REIMBURSED OR SPONSORED TRAVEL –** Have you, your spouse, and dependent children received any reimbursed or sponsored travel that exceeds $5,000 over the preceding 12 months from an entity that is related to your ***institutional responsibilities*** performed on behalf of the applicant and/or recipient Institution?

As part of the travel disclosure, provide the following information for each entity in which reimbursed or sponsored travel is identified unless travel is received from a federal, state, or local government agency located in the United States, a United States Institution of higher education, an academic teaching hospital, a medical center, or a research institute that is affiliated with a United States Institution of higher education:

- Value of the reimbursed or sponsored travel _____
- Purpose of the trip: _____
- Identity of the sponsor/organizer: _____
- Destination: _____
- Duration: _____
- No SFI(s) exist under this category _____

Although this is an institutional determination, in your opinion are any disclosed "Significant Financial Interests" identified above related to an application that is expected to be awarded or an already funded research project per the criteria below:

- Could the SFI be affected by the funded research? Yes ☐ No ☐
- Is the SFI in an entity whose financial interest could be affected by the funded research? Yes ☐ No ☐

If yes, provide which SFI(s) you believe meets the criteria for relatedness to the funded research from what is disclosed above. The institution's designated official(s) will consider this information when making determinations of FCOI.

_____

I certify under penalty of perjury that this is a complete disclosure of all my domestic and foreign significant financial interests that are related to my **institutional responsibilities** (e.g., research, research consultation, research publication, fundraising, teaching, professional practice, product development, product testing, etc.) and are not limited to my funded research. In addition, 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 it is my responsibility to disclose my significant financial interests on an annual basis and within 30 days of discovering or acquiring a new significant financial interest or within 30 days of each travel occurrence that may arise during the period of performance of a funded project. I also certify that I have received FCOI training prior to engaging in funded research and/or within the past four years. Please attach Certificate of Completion of Tutorial on FCOI Federal Requirements.

Investigator's Printed Name _____ Signature _____ Date _____