

**FAU**  
Florida Atlantic University  
Division of Research/Sponsored Programs  
**SIGNIFICANT FINANCIAL INTEREST DISCLOSURE FORM**

**Section I:**

Preface: Federal and state regulations require that a university manage, reduce or eliminate any actual, potential or perceived financial conflicts of interest that may arise as a result of compensated outside activities or other financial interests of persons involved in sponsored research projects. A conflict of interest is best described as a situation in which a person serves or represents two distinct entities or persons and must choose between two conflicting loyalties or interests. **A researcher has a conflict when their outside activity or financial interest could potentially interfere with the employee's research obligations.** This form must be submitted to the office of Sponsored Programs, Division of Research upon initial submission of a proposal; annually on projects funded for more than one year; and updated if a person's significant financial interest changes during the course of a funded research project.

**Investigator:**

**Department / College:**

**Title of Project / Proposal :**

**Funding Agency:**

**Type of Disclosure:**  Initial Submission     Annual Update     Change

**A. Mandatory Training**

The Division of Research requests researchers to complete conflict of interest training through CITI within 30 days of a proposal submission. Effective January 1, 2016, account set up for all funded awards, regardless of funding source, will not proceed without completion of the required training component.

For more details, visit the DOR Training Website: <http://www.fau.edu/research/financial-conflict-of-interest.php#collapseFour> or  
Advice for Compliance Training (ACT) <http://www.fau.edu/research/act/> for more details

**B. Disclosure of Significant Financial Interest**  **(See Appendix A for Definitions)**

**A researcher has a conflict when their outside activity, or financial conflict of interest, could potentially interfere with the employee's research obligations. With this in mind, please answer the following questions as it relates to your research obligations**

1. Have you, your spouse or dependent children, received income or other remuneration (remuneration includes salary and any payment for services not otherwise identified as salary e.g. consulting fees, honoraria, paid authorship); equity interest including any stock, stock option, or other ownership interest, as determined through reference to public prices or other reasonable measures of fair market value from a publicly traded entity, in the amount of \$5,000 or more within the prior 12 months?       Yes     No
2. Do you, your spouse or dependent children, have any equity / managerial interest from / in a publicly traded entity that is valued at \$5,000 or more within the prior 12 months?       Yes     No
3. Have you, your spouse or dependent children, received income or other remuneration from a non-publicly traded entity in the amount of \$5,000 or more within the prior 12 months?       Yes     No
4. Do you, your spouse or dependent children, have any equity / managerial interest (e.g. stock, stock option or other ownership interest) in a non-publicly traded entity in any amount within the prior 12 months?       Yes     No
5. Do you, your spouse or dependent children, receive income from any Intellectual Property rights and interests (e.g. Patents, licenses, royalties and copyrights) other than from FAU, in a value of \$5,000 or more within the prior 12 months?       Yes     No
6. Have you, your spouse or dependent children, received reimbursed or sponsored travel income (>\$5,000) from a source other than a sponsored local, state or federal source or institution of higher education?       Yes     No

**If you have answered YES to any of the questions,** please complete, sign, and return Section 2 below for each significant financial interest (meaning each company or equity interest) along with this form to Sponsored Programs.

**If you answered NO to all of the questions above,** please sign and return this form, only.

I certify, to the best of my knowledge and belief, that the above questions have been answered correctly and that I will update and revise the answers as required.

**Investigator's Signature:**

**Date:**

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**Section II:**

Instructions: If you answered YES to any of the questions from Section I, please complete a separate form of Section II for each entity. (For example, if you have equity interest in a company in the amount of \$5,000 or more and you were reimbursed for travel please complete 1 form for the equity interest and a separate form for the travel.

Please remember to sign and have your dean or department chair sign.

**Complete a separate form (Section II) for each company you have a Significant Financial Interest in**

**Name of Company / Equity Interest:**

1) Nature of the financial interest (Examples: travel, ownership interest, gift, consulting fees, equity interest, managerial interest, loan)

2) Name, address and web URL of entity:

3) Please provide **in detail** what the business (or service) does or provides:

4) Your relationship/role/duties or responsibilities in this company or entity (Please describe in detail):

5) Business structure of the entity (Examples: publicly traded for-profit entity, non public for-profit entity, nonprofit entity, foundation):

6) What is the role of the entity (if any) in this specific sponsored research project

None       Sponsor       Sub recipient       Vendor       Other

7) Justify the entity's inclusion in this sponsored research project:

8) Travel (if applicable)

A. Name of Person Traveling:

Self       Spouse       Dependent Child

B. Purpose:

C. Funded by:

D. Destination:

E. Duration:

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9) Describe (in detail) how the entity you have identified relates to or impacts this specific sponsored research project:

10) In your opinion, describe (in detail) how you would safeguard objectivity of this specific sponsored research project despite the significant financial interest you have disclosed:

11) In your opinion, describe (in detail) how you would propose to monitor this specific sponsored research project to ensure objectivity and the integrity of the research despite the significant financial interest you have disclosed:

12) Describe your supervisory role in this sponsored research project (include any supervision over students involved in the research):

I agree and certify that to the best of my knowledge that I have answered these questions correctly. I will update this disclosure annually during the period of the award and any time new reportable significant financial interests occur. I will comply with any conditions or restrictions imposed by Florida Atlantic University to manage, reduce or eliminate actual, potential, or perceived conflict of interest, or forfeit the award.

Investigator's Signature:

Date:

**As Dean or Department Chair,**

I have reviewed this form including faculty member's disclosure(s) of Significant Financial Interest and approve of their roles in the entities disclosed related to their faculty research responsibilities to FAU.

Dean or Department Chair Approval:

Date:

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## Appendix A.

### Terms and Definitions

**You** means you, your spouse, and/or dependent children.

**Significant Financial Interest (SFI)** is defined as:

1) A financial interest consisting of one or more of the following interests of the Investigator (and those of the Investigator's spouse and dependent children) **that reasonably appears to be related to the investigator's institutional responsibilities:**

- i) 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. For purposes of this definition, 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 option, or other ownership interest, as determined through reference to public prices or other reasonable measures of fair market value;
- ii) 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 or dependent children) holds any equity interest (e.g., stock, stock option, or other ownership interest); or
- iii) Intellectual property rights and interests (e.g., patents, copyrights), upon receipt of income related to such rights and interests.

2) Investigators also must disclose the occurrence of any reimbursed or sponsored travel (i.e., that which is paid on behalf of the Investigator and not reimbursed to the Investigator so that the exact monetary value may not be readily available), related to their institutional responsibilities; provided, however, that this disclosure requirement does not apply to travel that is reimbursed or 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. The Institution's FCOI policy will specify the details of this disclosure, which will include, at a minimum, the purpose of the trip, the identity of the sponsor/organizer, the destination, and the duration. In accordance with the Institution's FCOI policy, the institutional official(s) will determine if further information is needed, including a determination or disclosure of monetary value, in order to determine whether the travel constitutes an FCOI with the PHS-funded research.

**Defined Threshold** means: \$5000 aggregate amount, on an entity-by-entity basis, for each of the following categories: 1) income from and equity in a publicly traded entity; 2) income from a non-publicly traded entity; 3) income from any intellectual property rights and interests; and 4) reimbursed or sponsored travel OR \$0 aggregate amount, on an entity-by-entity basis, for: 1) equity in a non-publicly traded entity; 2) income from managerial interest.

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**Institutional Responsibilities** means University Personnel's professional responsibilities on behalf of the University, which may include for example: current or proposed activities such as research, research consultation, research-related student supervision, teaching, professional practice, institutional committee memberships, and service on panels such as Institutional Review Boards or Data and Safety Monitoring Boards] and/or could reasonably affect or be affected by the outcome of the sponsored project and has been/will be possessed and/or received during a 12-month period prior to and/or after the disclosure.

The following **EXCLUSIONS** apply to the definition of a SFI:

- Salary, royalties, or other remuneration paid by the University to University Personnel (UP) if UP are currently employed or otherwise appointed by the University, 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, as long as UP do 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 (Government Agency), an Institution of higher education as defined in 20 U.S.C. 1001(a) (Higher Education Institution), an academic teaching hospital, a medical center, or a research institute that is affiliated with a Higher Education Institution;
- Income from service on advisory committees or review panels for a Government Agency, a Higher Education Institution, an academic teaching hospital, a medical center, or a research institute that is affiliated with a Higher Education Institution;
- Travel reimbursed or sponsored by a Government Agency, a Higher Education Institution, an academic teaching hospital, a medical center, or a research institute that is affiliated with a Higher Education Institution; and
- Grants and contracts administered through the University.