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**Financial Interest Disclosure Form for University Personnel Receiving**

**Grants & Other External Funding**

University FCOI Policy (<https://www.newhaven.edu/research/fcoi/index.php> or <https://mycharger.newhaven.edu/web/mycharger/policies-procedures-grants>):

The Financial Conflict of Interest (FCOI) policy defines the obligations of *Investigators* in the University’s research community and governs *Investigators*’ financial interests / relationships related to their research, regardless of funding source.

**“Investigator”** means the principal investigators, project directors, co-investigators, senior personnel, project staff and any employee at the University who is responsible for the design, conduct, or reporting of the research, project, or educational activity funded or proposed for funding by an external sponsor. The term “investigator” also means the investigator’s spouse and dependent children.

A Significant Financial Interest (SFI) consists of interests by the investigator (and those of the investigator’s spouse and dependent children) that reasonably appears to be related to the investigator’s institutional responsibilities and that could directly and significantly affect the design, conduct, or report of funded research or other institutional projects.

Applicability: This policy is applicable to **all externally-funded research, contracts, and projects being conducted under the University’s auspices.**

Employee Name: \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

Department: \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

*For PHS/NIH projects, which require disclosure prior to each submission:*

*Title of Project:* \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

I am disclosing the following significant financial interests, **including interests of my spouse and dependent children**, that would appear to affect current, pending, or anticipated sponsored project(s). You must use the definitions outlined in this document. Indicate whether you have a potential SFI in each of the categories and, if relevant, attach related documentation.

**“Significant financial interests”** means anything of monetary value, including, but not limited to:

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| --- | --- | --- |
| **1. Salary or other payment for services (e.g., consulting fees or honoraria)**  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:  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).  Example:  As PI/PD you employ your spouse/partner to work on the project.  As PI you are going to issue a subcontract to a company for which you also consult. | This category does **not** include:  1. Salary, royalties or other remuneration from the University;  2. Income from seminars, lectures, or teaching engagements sponsored by public or nonprofit entities;  3. Income from service on advisory committees or review panels for public or nonprofit entities;  4. Salary, royalties or other payments that when aggregated for the investigator and the investigator’s spouse and dependent children, are not expected to exceed $5,000 during the next twelve month period.  5. 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. | \_\_\_ Yes, I have an SFI to declare.  \_\_\_ No, I have no SFI to declare. |
| **2. Equity interests (e.g., stocks, stock options, or other ownership interests)**  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).  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.  Example: You are applying for funding for research that overlaps with a company in which you have stock or an ownership interest. | This category does **not** include:  An equity interest that, when aggregated for the investigator and investigator’s spouse and dependent children, meets **both** of the following tests:  1) does not exceed $5,000 in value as determined through reference to public prices or other reasonable measures of fair market value, and  2) does not represent more than a 5% ownership interest in any single entity. | \_\_\_ Yes, I have an SFI to declare.  \_\_\_ No, I have no SFI to declare. |
| **3. Intellectual property rights and interests (e.g., patents, copyrights, and royalties from such rights)**  Income from an interest in any intellectual property rights impacted by current or pending projects.  Example: You own or have applied for a patent outside of the University auspices and you could benefit financially if the external funding has potential to increase the value of your product. | This category does not include:  Intellectual Property Rights assigned to the Institution and agreements to share in royalties related to such rights. | \_\_\_ Yes, I have an SFI to declare.  \_\_\_ No, I have no SFI to declare. |

I have the following SFIs:

|  |  |
| --- | --- |
| Type of SFI  Category (1, 2, 3 above) | Description of SFI |
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|  |  |
|  |  |

Add more lines as needed.

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Employee Signature Date

In addition to meeting the above disclosure obligations, **employees must receive FCOI training through the FCOI training offered through CITI Program** (<https://www.citiprogram.org>) as COI modules prior to engaging in research or other externally funded activities at the University; training must be renewed at least every three years. Note: This is separate from the University’s COI mandated training.

Additional tutorials are available through NIH at <https://grants.nih.gov/grants/policy/coi/tutorial2018/story_html5.html>.

If you have questions about the process or whether you have any SFIs (Significant Financial Interests) to disclose, please contact the Office of Grants and Sponsored Programs for assistance. When in doubt, it’s best to disclose.

**Disclosure Procedure**

1. All investigators must disclose their significant financial interests using this form. You may be asked to submit supporting documentation if a potential FCOI is identified. The completed form and training certificate must be submitted to [FCOI@newhaven.edu](mailto:FCOI@newhaven.edu). The Disclosure forms will be reviewed by the Provost, Vice Provost for Research, or other designee and will be treated as confidential. However, NIH requires public disclosure of SFIs that are determined to be FCOIs if a PHS/NIH project is funded.

2. The disclosure must be filed annually in October *and* whenever new significant financial interests are obtained. Submit the Disclosure Form and a copy of your FCOI training certificate to [FCOI@newhaven.edu](mailto:FCOI@newhaven.edu).

2a. NIH proposals must also include FCOI verification prior to Internal Routing Form approval and submission.

3. The Provost or designee will determine whether a financial conflict of interest exists and determine what conditions or restrictions, if any, should be implemented to manage, reduce, or eliminate conflicts of interest.

3a. The approved conditions or restrictions must be incorporated into a management plan between the University and the investigator. A copy of financial-related management components will be filed with the Finance Director for Sponsored Programs.