

## CONFLICT OF INTEREST DISCLOSURE FORM FOR FEDERAL AND STATE GRANTS

### **Purpose:**

Roger Williams University (the “University”), in accordance and consistent with the University’s Conflict of Interest Policy, dated February 5, 2008 and reauthorized May 22, 2012, has developed this Conflict of Interest Disclosure Form for Investigators (as defined below) who are applying for or have already received federal and/or state grants to ensure the Investigator’s compliance with federal and state regulations governing the issuance of grants. Investigators must complete this Conflict of Interest Disclosure Form at the time their proposals are submitted, and must update the form during the period of the grant award, either on an annual basis or within thirty (30) days of discovering or acquiring (i.e., through purchase, marriage, or inheritance) a new Significant Financial Interests (as defined below), whichever occurs first.

### **Definitions:**

“Financial Conflict of Interest (“FCOI”)” means a significant financial interest that could directly and significantly affect the design, conduct, or reporting of grant-funded research.

“Financial Interest” means anything of monetary value, whether or not the value is readily ascertainable.

“Immediate Family” means the Investigator’s spouse or domestic partner (consistent with University health benefits policy and procedure) and dependent children, including stepchildren.

“Investigator” means the project director or principal Investigator and any other person, regardless of title or position, who is responsible for the design, conduct, or reporting of research funded by the grant, or proposed for such funding, which may include, for example, collaborators or consultants.

“Significant Financial Interest” means:

- (1) A financial interest consisting of one or more of the following interests of the Investigator (and those of the Investigator’s Immediate Family) 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 (12) 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 (12) months preceding the disclosure, when

aggregated, exceeds \$5,000, or when the Investigator (or the Investigator's Immediate Family) holds any equity interest (e.g., stock, stock option, or other ownership interest); or

(iii) Intellectual property rights and interest (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 grant-funded research.
- (3) The term *significant financial interest* does not include the following types of financial interests: salary, royalties, or other remuneration paid by the institution 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 is a commercial or for-profit organization; 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, 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 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.

**Disclosure:**

Each Investigator must disclose all Significant Financial Interests (including those of his or her Immediate Family).

Do you or any member of your Immediate Family have one or more Significant Financial Interests?

Yes

No

If you answered “yes” to the question above, please provide a detailed statement explaining the Significant Financial Interest(s). Attach additional sheets of paper if necessary.

Name, Title &

Department/School: \_\_\_\_\_

Please check the type of disclosure and complete the requested information. Please attach additional sheets if necessary.

This is an **Initial Disclosure** (for *new* grants). Please list all the grant(s) to which this disclosure applies:

This is an **Updated Disclosure** (a new Significant Financial Interest has been discovered or acquired since your last disclosure). If this disclosure does not apply to all of your outstanding federal and state grants, please list the grant(s) to which this disclosure applies:

This is an **Annual Disclosure**. Annual disclosures should be submitted on or about May 15<sup>th</sup> of each year. Please list all the grant(s) to which this disclosure applies:

I affirm that the above information and any information on attached statements are true to the best of my knowledge.

\_\_\_\_\_  
DATE

\_\_\_\_\_  
SIGNATURE

**Administrative Review and Approval:**

The Investigator has not reported a Significant Financial Interest, and, to the best of my knowledge, no conflict of interest exists.

The Investigator has reported a Significant Financial Interest, and, to the best of my knowledge, no conflict of interest exists.

The Investigator has reported a Significant Financial Interest, and a conflict of interest that warrants further review may exist.

\_\_\_\_\_  
DATE

\_\_\_\_\_  
DEAN'S SIGNATURE

(Dean's Office: Please return the original form to the Office of Sponsored Programs and send a copy to the Investigator)