



# Investigator's Detailed Financial Interest Disclosure Form

For All Sponsored Projects  
**CONFIDENTIAL**

Questions? Contact [Disclosures@uml.edu](mailto:Disclosures@uml.edu) or call 978-934-3553

*This information is required to comply with the UMass "Policy and Guidelines for Promoting Objectivity in Biomedical Research", "Conflict of Interest in Research and Scholarly Activity Policy" and applicable federal regulations regarding disclosure of any financial interests that reasonably appear to be related to the Investigator's Institutional Responsibilities. See <http://grants.nih.gov/grants/policy/coi>. Instruction and Definitions on last page.*

## A. Principal Investigator Information Related to Proposal/Award

Principal Investigator Name (Last, First, and MI):		
Department:	Email:	Phone:
Proposal/Project Title:		
Sponsor Name:		
Subcontract: ( ) Yes or ( ) No      Name of Subcontractor:		
If UML is subcontractor, Name of Prime Sponsor:		

### 1. Check the appropriate funding source (This determines applicable threshold values):

- ( ) PHS (including NIH) Agency (Significant Financial Interest threshold is \$5,000)
- ( ) Other Federal Agency (Significant Financial Interest threshold is \$1,000 for Clinical research and \$10,000 for Non-Clinical research)
- ( ) External Funding, Non-Federal (Significant Financial Interest threshold is \$10,000)

Please list **ALL** of your Significant Financial Interests (this includes those of your spouse/domestic partner and dependent children) that reasonably appear to be related to your Institutional Responsibilities.

### 2. Significant Financial Interests

For each Significant Financial Interest (including those of your spouse, /domestic partner, and dependent children), provide the following information (copy the table or use additional pages as needed for multiple interests to report):

<b>Name of Entity for which you have a financial interest:</b>	
<b>Nature of Financial Interest:</b> Describe for example, whether the potential FCOI is from equity, consulting fees, etc. Provide copies of applicable consulting agreement or stock purchase agreement.	
<b>Disclose the monetary value of the financial interest:</b> (No value is needed for equity interests of privately-held entities. Estimate the approximate value if the exact value is not readily available.)	

### 3. Travel Reimbursements

**Investigators must disclose the following additional travel related Significant Financial Interests:**

During the past 12 months did you receive a payment (either as an advance or a reimbursement) for travel (this includes transportation, lodging and meals) from either a for-profit organization or a non-university non-profit organization, or were the costs of travel (alone or together with lodging and/or meals) paid directly for you by any such organization? (Excluded are non-university non-profit organizations that are federal, state or local government agencies.)      ( ) **NO**      ( ) **YES**

If **yes**, answer the following questions in the table below (copy table and complete if you have more than one travel reimbursement/payment/sponsor to report):

<b>Name of Sponsoring Organization:</b>	
<b>Purpose of the Trip (why were you paid for the travel):</b>	
<b>Destination and Duration:</b>	
<b>Disclose the Monetary Value of the Travel Expenses:</b> (Estimate the approximate value if the travel is not reimbursed directly and the exact value is not readily available.)	

**4. Certification:**

**Name of Investigator:**

**Date of Certification:**

\_\_\_\_\_  
**Signature of Investigator**

**Instructions for Detailed Disclosures**

You have received this form to complete because you indicated on the Sponsored Project Summary Disclosure of Financial Interests Form (sent to ORA at the time of proposal submission) that you have a Significant Financial Interest to report. Please complete this form with as much detail as possible. This information is confidential and should be submitted to [Disclosures@uml.edu](mailto:Disclosures@uml.edu) or sent in a sealed envelope to the Director, Office of Research Integrity, 2<sup>nd</sup> Floor Wannalancit. The information will be reviewed and you will be notified if any further clarification or action is required.

Please provide a copy of any applicable consulting agreement or stock purchase agreement or other relevant documents. This form and any related attachments, once completed, contain confidential personnel information, and shall be treated as sensitive and any company proprietary or confidential information shall be likewise treated with care. The disclosure, if resulting in a FCOI, may be reviewed by the Conflict of Interest Oversight Committee. Allow sufficient time for the review, and, if necessary, a management plan to be developed.

For more information see: FCOI Policy at NIH website: <http://grants.nih.gov/grants/policy/coi>

Every proposal submitted through ORA must include disclosure of financial interest and/or relationships that would be of interest to the sponsor for investigator(s) (including those of his/her spouse, domestic partner, and children) as well as other Key Personnel since the sponsor requires honesty and transparency.

**Review Process and Guidelines**

The Office of Institutional Compliance will review the Investigator's Detailed Disclosure Form to ensure completeness and consistency with prior disclosures. The form, along with any supporting documentation, shall be forwarded to the UMass Lowell Conflict of Interest Committee for review as necessary. The Committee will consider whether any of the disclosed Significant Financial Interests of the Investigator is related to the project and whether the financial interest could directly and significantly affect the design, conduct or reporting of the project. If the campus committee determines that there is a financial conflict of interest, it will draft a proposed management plan for the Vice Chancellor of Research and Innovation to present at the Systemwide Conflicts Committee.

Following are examples of when an Investigator have a financial conflict of interest (FCOI):

- (i) if the Investigator (together with his/her spouse or domestic partner and dependent children) has a significant financial interest in an entity that could be affected by the research results from a proposed PHS-funded contract based on an analysis of the scope and subject matter of the proposed project described in the application, or
- (ii) if the Investigator (together with his/her spouse or domestic partner and dependent children) has a significant financial interest in an entity that licenses technology from the University which has resulted in license income and that technology is the subject of a proposed PHS-funded award. The designated institutional official(s) may consult with all appropriate institutional and governmental officials to evaluate the potential COI.

## Definitions

**Conflicts of Interest** refers to situations in which a person has two or more contradictory financial or other personal considerations may compromise, or have the appearance of compromising a researcher's professional judgment in conducting or reporting **research**.

### **“Significant Financial Interest” for PHS Agencies (and NIH):**

1. With regards to **Publicly-Traded Entities**, payments or value exceeding \$5,000 (when aggregated for a PI and the PI's spouse/domestic partner and dependent children) from a single entity during the prior 12 months. This includes any salary, consultant payments, honoraria, paid authorship, equity interest (stock, stock option or other ownership interest)
2. With regards to **Privately Held Entities**, payments or value exceeding \$5,000 (when aggregated for a PI and the PI's spouse/domestic partner and dependent children) from a single entity during the prior 12 months or when the PI and the PI's spouse/domestic partner and dependent children hold **any** equity interest (stock, stock option, or other ownership interest).
3. With regards to **Intellectual Property**, intellectual property rights and interests (patents, copyrights) **upon receipt of income** related to such rights and interests.
4. With regards to **Travel Reimbursements**, any reimbursed or sponsored travel related to the PI's Institutional Responsibilities during the prior 12 months (with the exception of 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).

The term “Significant Financial Interest” **does not include**: salary, royalties, or other remuneration paid by the University to the Investigator if the Investigator is currently employed or otherwise appointed, including intellectual property rights assigned to the Institution and agreements to share royalties related to such rights; income from investment vehicles, such as mutual funds and retirement accounts; income from seminars, lectures, or teaching engagements 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 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 affiliated with an institution of higher education.

### **“Significant Financial Interest” for NSF, Other Non-PHS Federal Agencies, and Non-Federal Sponsors:**

*Significant Financial Interest*," which is defined as anything of monetary value, including but not limited to salary or other payments for services (e.g., consulting fees or honoraria); equity interests (e.g., stocks, stock options, or other ownership interests); and intellectual property rights (e.g., patents, copyrights, and royalties from such rights), but **NOT** including any of the following: (i) salary, royalties, or other remuneration from the University; (ii) income from seminars, lectures, or teaching engagements sponsored by public or nonprofit entities; (iii) income from service on advisory committees or review panels for public or nonprofit entities; (iv) an equity interest that, when aggregated for the Investigator and his or her spouse and dependent children, meets both of the following tests: (x) does not exceed \$10,000 in value as determined through reference to public prices or other reasonable measures of fair market value; and (y) does not represent more than a five percent ownership interest in any single entity; (v) salary, royalties, or other payments (including equity) that, when aggregated for the Investigator and his or her spouse and dependent children over the next twelve months, are not reasonably expected to exceed \$10,000; **and**

- (2) any of the following circumstances apply:
  - (a) when the grant application is submitted, the Significant Financial Interest would reasonably appear to be affected\* by the proposed research;
  - (b) during the period of the award, the Significant Financial Interest would reasonably appear to be affected by the ongoing research;
  - (c) when the grant application is submitted, the Significant Financial Interest is in one or more entities whose financial interests would reasonably appear to be affected by the proposed research; or
  - (d) during the period of the award, the Significant Financial Interest is in one or more entities whose financial interests would reasonably appear to be affected by the proposed research.

**What are “Institutional Responsibilities”?** This refers to a PI's professional responsibilities on behalf of the Institution, including activities such as research, teaching, clinical or other professional practice, academic activities, scholarly events, institutional committee memberships, and service on panels such as Institutional Review Boards or Data and Safety Monitoring Boards.

*Retention of Information: Three (3) years after termination of sponsored project or until resolution of any action by the sponsor, whichever is greater.*