

## Government, Foundation & Industry Conflict of Interest (COI) Information

This form is required to be filed for every proposal to private foundations, industry and any government entity that has not adopted PHS/NIH or NSF policies. Please submit it with the Proposal Routing Form (PRF). It is required for all Investigators and any other person who is responsible for the design, conduct, or reporting of the research. If an Investigator has a reportable financial interest, it must be disclosed to SPA when the Investigator submits the relevant grant proposal and whenever a reportable financial interest arises during the period of an award. Please complete the applicable section(s) below and return to SPA.

### What is Required?

All Covered Individuals (See: BoT Policy T96-039) must disclose a significant financial Interest to the Vice Chancellor for Research or his or her designee in situations in which the Financial Interest may present a Conflict of Interest involving the use of students, technology transfer activities or the outcome of research that is performed or directed by that Covered Individual with significant use of University funds, facilities or equipment. "Covered Individual" includes the Principal Investigator, Program Director, Co-Investigator, and any other person who is responsible for the design, conduct, or reporting of research, educational, or service activities funded, or proposed for funding. In addition, some federal agencies and non-profit organizations may require disclosure of a Financial Interest under certain circumstances. Compliance with these policies is applicable to all externally-funded grants and contracts. Disclosures must be made prior to the submission of proposals for funding. If a new reportable *Significant Financial Interest* develops at any time following the submission of a proposal but prior to the end of the project period of any subsequent award, the filing of a new disclosure is also required.

"**Significant Financial Interests**" are 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) of the *Investigator* and the *Investigator's* spouse and dependent children.

**Clinical Research** - In relation to Clinical Research that is performed or directed by a Covered Individual, "Significant Financial Interest" means (i) any Equity in a Company that is directly owned by, or is under the control of, a Covered Individual or a member of his or her immediate family or (ii) Non-Equity Compensation from a Company in an aggregate amount greater than \$1,000 within the prior twelve-month period that is directly or indirectly received by or contractually promised to a Covered Individual or a member of his or her immediate family.

**Non-Clinical Research** - In relation to research other than Clinical Research that is performed or directed by a Covered Individual, "Significant Financial Interest" means either (i) Equity that represents more than one percent (1%) of the total equity in a Company or has a total current value of more than \$10,000 that is directly owned by, or is under the control of, such Covered Individual or a member of his or her immediate family or (ii) Non-Equity Compensation in an aggregate amount greater than \$10,000 within the prior twelve-month period that is received by or contractually promised to a Covered Individual or a member of his or her immediate family.

### Significant Financial Interest does not include:

- Salary, royalties, or other remuneration from the University; Income from seminars, lectures, or teaching engagements sponsored by public or nonprofit entities; Income from service on advisory committees or review panels for public or nonprofit entities;

Each *Investigator* must disclose all *Significant Financial Interests*:

- that would reasonably appear to be affected by the research, educational, or service activities funded or proposed for funding, by an external sponsor; or in entities whose interests would reasonably appear to be affected by such activity.

If you have a significant financial interest to report: please complete a Disclosure of Financial Interest Form. Attach the Disclosure form in an envelope marked "confidential" to the summary disclosure and submit to SPA.

## Government, Foundation & Industry Proposal Summary Disclosure Form

<b>THIS SECTION IS REQUIRED</b>	
PI Name:	Project Title:
	Project Start and End Dates:
Department:	Award No. (If Continuation Proposal):
	Sponsor:
Contact Phone:	If UMass-D is Subcontractor, Name of Prime Sponsor:
	Is there a Subcontract on Proposal: ( )Yes or ( )No
E-mail:	Name of Subcontractor:

**SECTION I - To Declare NO REPORTABLE Significant Financial Interest:**

I hereby declare that (1) I, my spouse, and my dependent children **do not** currently have *Significant Financial Interest(s)* that must be disclosed under University policy (BOT Doc. T96-039) with respect to the above-referenced proposal; and (2) I will update this disclosure if any of the aforementioned parties secure new *Significant Financial Interests* that require disclosure.

Investigator or Key Personnel Signature: \_\_\_\_\_ Date: \_\_\_\_\_

**SECTION II - To Declare a REPORTABLE Significant Financial Interest:**

I hereby declare that (1) I, my spouse, and/or my dependent children **do** have a *Significant Financial Interest(s)* that must be disclosed under University policy (BOT Doc. T96-039) with respect to the above-referenced proposal. Supporting documentation to identify each of the specific entities involved and the nature/amount of the interest(s) is attached in an envelope marked CONFIDENTIAL; and (2) If the University determines that this *Significant Financial Interest* could directly and significantly affect the design, conduct, or reporting of the proposed project, I will:

- Cooperate in the development and execution of a Conflict of Interest Resolution Plan prior to expenditure of awarded funds;
- Comply with any conditions or restrictions imposed by the Resolution Plan to manage, reduce, or eliminate any actual or potential conflict of interest; and
- Update this disclosure if I, my spouse, or my dependent children secure any new *Significant Financial Interest(s)* that require disclosure.

Investigator or Key Personnel Signature: \_\_\_\_\_ Date: \_\_\_\_\_

**Endorsement For Submission of Proposal**

I have reviewed this Disclosure Form and am aware of both the *Investigator's* proposed role in this project and the reported *Significant Financial Interest*. If it is determined that this *Significant Financial Interest* could create a conflict of interest, I understand that an approved Resolution Plan must be developed prior to the expenditure of any awarded funds. On this basis, I recommend that the above-referenced proposal be submitted to the Sponsor at this time in order to expedite its consideration.

Department Chair Signature: \_\_\_\_\_ Date: \_\_\_\_\_

**SECTION III - PRINCIPAL INVESTIGATOR CERTIFICATION:**

*To the best of my knowledge, I certify that the information provided above is accurate. I certify that (1) the information submitted within the application is true, complete and accurate to the best of my knowledge; (2) any false, fictitious, or fraudulent statements or claims may subject me to criminal, civil, or administrative penalties; and (3) that all persons who are responsible for the design, conduct, or reporting of research, educational, or service activities funded, or proposed for funding has completed and submitted a summary disclosure form.*

Investigator or Key Personnel Signature: \_\_\_\_\_ Date: \_\_\_\_\_

If you have a significant financial interest to report: please complete a [Disclosure of Financial Interest form](#). Attach the Disclosure form in an envelope marked "confidential" to the summary disclosure and submit to SPA.