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# Office of Sponsored Programs and Foundation Relations

# GENERAL FINANCIAL CONFLICT OF INTEREST DISCLOSURE FORM FOR GRANTS

# INITIAL Disclosure UPDATE

# *Established March 2014*

# *Last updated July 2021*

# *Next Review Fall 2023*

***The individual submitting this form must have an up-to-date certificate from CITI for successfully completing the Faculty COI training grants course. See OSPFR staff for instructions on how to access this online training.***

The Principal Investigator/Project Director and any key personnel must complete an updated disclosure form before submitting a grant proposal, and then resubmit at least annually during the grant period, or within 30 days of discovering or acquiring a new significant financial interest.

**Submit your completed form to the Office of Sponsored Programs and Foundation Relations.**

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| --- | --- | --- | --- |
| Name: | Department/School: | | |
| Project Role:  PD/PI Co-PD/PI Senior/Key Personnel Consultant  Subrecipient Other (explain): | | | |
| Project Lead PI/PD (if not identified above): | | | Project Period: |
| Project/Grant Title: | | | |
| Agency/Sponsor’s Name: | | Agency/Sponsor Award Number: | |

**Financial Interest** means anything of monetary value received or held by an Investigator or an Investigator’s Family, whether or not the value is readily ascertainable, including, but not limited to: salary or other payments for services (e.g., consulting fees, honoraria, or paid authorships for other than scholarly works); any equity interests (e.g., stocks, stock options, or other ownership interests); and intellectual property rights and interests (e.g., patents, trademarks, service marks, and copyrights), upon receipt of royalties or other income related to such intellectual property rights and interests.

# Financial Interest does NOT include:

# Salary, royalties or other remuneration from the University; or

# Income from seminars, lectures or teaching engagements sponsored by public or non-profit entities; or

# Income from service on advisory committees or review panels for public or nonprofit entities; or

# Equity interests or income from investment vehicles, such as mutual funds and retirement accounts, so long as the Investigator does not directly control the investment decisions.

**Significant Financial Interest (SFI)** is anything of monetary value over $100 that would reasonably appear to affect the sponsored project or its results, including, but not limited to:

# Salary or other payments for services from an outside entity (*e.g.*, consulting fees or honoraria). *This does not include grant funds paid to you through St. John Fisher University.*

# Equity interests (*e.g.*, stocks, stock options or other ownership interests), *valued, as of the date of disclosure combined with any remuneration in the past 12 months*.

# Intellectual property rights (*e.g.*, patents, copyrights, trademarks, trade secrets, and/or any royalties from such rights), *valued, when aggregated for the Investigator (including his/her spouse and dependent children).*

# A fiduciary or management role (*e.g.*, as a board member, director, officer, partner, trustee, employee or consultant) for a sponsor, vendor or (sub)contractor related to the sponsored project.

**Financial Conflict of Interest (FCOI)** means a Significant Financial Interest (or, where the provost requires disclosure of other Financial Interests, a Financial Interest) that the Institution reasonably determines could directly and significantly affect the design, conduct or reporting of sponsored projects.

# Do you, your spouse, domestic partner and/or dependent child(ren) have a Significant Financial Interest in any business or legal entity that would reasonably appear to be affected by this project or its results?

# YES NO

# If you checked YES above:

# Check all that apply AND provide the following information in a sealed envelope to the Office of Sponsored Programs and Foundation Relations: The name of the entity, the nature of the interest, its value, and any relevant documentation. Mark the envelope with your name and the word *CONFIDENTIAL*.

# Salary or other payment for services (e.g., consulting fees or honoraria)

Equity interests (e.g., stocks, stock options, or other ownership interests)

Intellectual property rights (e.g., patents, copyrights, trademarks, trade secrets, and royalties from such rights)

Other significant financial interest that would reasonably appear to affect or be affected by the results of the research or educational activities funded or proposed for funding

# A fiduciary or management role for a sponsor, vendor or (sub)contractor related to the sponsored research.

**CERTIFICATION BY INVESTIGATOR:**

1. I have read and understood the St. John Fisher University General Financial Conflict of Interest Policy for Grants.
2. To the best of my knowledge, I have made all required financial disclosures.
3. I agree to update this disclosure form during the award period AND within 30 days if I acquire new significant financial interests that must be reported.
4. I agree to comply with any conditions or restrictions imposed by St. John Fisher University to manage, reduce or eliminate actual or potential conflicts of interest in connection with this grant. I understand that if I fail to comply, I understand that the University may decline the grant award or terminate the sponsored project or program.
5. *If relevant:* I have been provided, as appropriate, with a copy of Chapter IX(A), Award and Administration Guidelines (National Science Foundation) and agree to abide by the disclosure responsibilities of an Investigator as defined in the guidelines and regulations.

**Signature of Investigator or Key Personnel \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ Date\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_**

# CERTIFICATION BY PRINCIPAL INVESTIGATOR/PROJECT DIRECTOR ONLY:

The following people (or roles) meet the definition of Investigator or Key Personnel for the above project, and I certify that they all will comply with the disclosure requirements of the St. John Fisher University General Financial Conflict of Interest Policy for Grants.

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| --- |
| List names or mark N/A: |

**Signature of Principal Investigator \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ Date\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_**