



University of South Alabama
Disclosure of Financial Conflict of Interest for
Extramurally Funded Research and Educational Activities
FORM A

PROJECT TITLE _____

AGENCY _____ LOG # _____ COM _____

This disclosure is a(n) _____ new statement _____ annual renewal _____ report of new financial interest

I have no significant financial interests. If checked, please do not complete FORM B.

- (a) that are related to or would reasonably appear to be affected by the research proposed for funding; or
 (b) in external entities whose financial interest would reasonably appear to be affected by such activities.

I am disclosing the following significant financial interest. If checked, please complete FORM B.

(see attached Fact Sheet on Conflict of Interest Disclosure for Definitions and Exclusions)

Salary or other payments for services

Equity or ownership

Intellectual property rights

Other significant financial interests that could affect or be perceived to affect
 the results of research or educational activities proposed for funding.

In submitting this statement, I affirm that:

I will comply with any conditions or restrictions imposed by the University of South Alabama to manage, reduce, or eliminate any conflict of interest identified through USA's oversight procedures. Such conditions will be specified in a written Memorandum of Understanding that is mutually satisfactory to me and the University. Furthermore, I understand that if the University and I can not arrive at a satisfactory Memorandum of Understanding, the sponsor will be notified of the existence of a conflict of interest which could not be managed by institutional measures, and I understand no funds may be expended from this award pending further review/ action by the sponsor.

I agree to update this Disclosure during the period of the award, either on an annual basis, or as new reportable significant financial interests are obtained.

Signature

Co-PI

Key Personnel

Date

All investigators involved in the project (including subcontractors, sub-grantees, etc.) have been informed of their obligations under federal regulations governing disclosure of significant financial interests and have no conflicts of interest or potential conflicts of interest that have not been disclosed.

Signature

PI

Date



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Fact Sheet

Under federal regulations governing objectivity in research, investigators are required to disclose a listing of Significant Financial Interests that would reasonably appear to be affected by the research or educational activities proposed for funding.

Procedures

1. Investigators submitting PHS or NSF proposals to the Office of Sponsored Programs for final review must attach form, "USA Disclosure of Financial Conflict of Interest for Extramurally Funded Research and Educational Activities."
2. Please refer to the "Significant Financial Interests" section below to determine if you have financial interests that must be reported. Disclosure is made by submitting a detailed written statement describing the significant financial interest when the proposal is presented for review.
3. If a conflict of interest is identified, the conflict must be resolved through the University or, if not resolved with the University, through the sponsoring agency prior to expenditure of any awarded funds.
4. It is the Principal Investigator's responsibility to ensure that the Disclosure of Financial Conflict of Interest forms for all investigators are obtained on a timely basis in order to meet proposal application deadlines. The Office of Sponsored Programs requires that the final review of proposals cannot begin until the proposal package includes this form for all investigators (investigators as defined below).

Definition of Investigators:

"Investigator" is any individual listed on the proposal who is responsible for the design, conduct, or reporting of the research or educational activity. This includes, but is not limited to, the principal investigator/project director and co-principal investigator(s). Other faculty investigators, staff, students, subcontractors, and sub-grantees are also included if they have responsibilities for the design, conduct, or reporting of the research or educational activity.

Each investigator must disclose all of his/her significant financial interests that are related to or would reasonably appear to be affected by the research funded or proposed for funding; or, in external entities, whose financial interests would reasonably appear to be affected by such activities.

Investigator Responsibility:

Each investigator must disclose all of his/her significant financial interests:

- that are related to or would reasonably appear to be affected by the research funded or proposed for funding; or
- in external entities whose financial interests would reasonably appear to be affected by such activities.

Each investigator must also certify to the institution that he/she:

- understands the obligations imposed by federal regulations governing disclosure of significant financial interests related to the research for which funding is requested;
- will comply with any conditions or restrictions imposed by USA to manage, reduce, or eliminate conflicts of interest;
- will update the disclosure information throughout the life of the project any time new significant financial interests are obtained, or at least annually.

Definition of Significant Interest

"Significant Financial Interest" refers to: salary or other payments for services, such as consulting fees and honoraria; equity interests, such as stocks and stock options; and intellectual property rights, such as patents, copyrights, and royalties. A Significant Financial Interest does not refer to salary or other remuneration from the university; income derived from seminars, lectures or teaching engagements sponsored by public or nonprofit entities; income derived from service on advisory committees or review panels for public or nonprofit entities; or salary, royalties or other payments that, when aggregated for the investigator and his or her spouse and dependent children, is not expected to exceed \$10,000 over a 12 month period, and does not represent more than a five percent ownership interest in any entity.

Significant Financial Interests must be disclosed at the time of the submission of the proposal, but approval of the outside activities and financial interests (with conditions if warranted) need not occur until the project has been funded. The federal regulations require that the disclosures be made annually during the course of the research, which is consistent with the university's requirement that any material changes to outside activities and financial interests must be reported during the academic year. Review and approval or disapproval of the interests disclosed during the course of a research project must be accomplished within 60 days.



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Disclosure of Relationships with External Entities
FORM B

PROJECT TITLE _____

AGENCY _____ LOG # _____ COM # _____

For each response of "Yes," provide the name of the entity or entities in the space following the question.

1. Identification of Relationships with External Entities

1. Are you currently participating, or do you expect to participate in the next 12 months, in funded or unfunded research on a technology, process or product development related to activities for which you are entitled to receive royalties under USA's royalty-sharing policies?
 NO YES

2. Are you currently participating, or do you expect to participate in the next 12 months, in clinical trials or evaluation or development of a technology, process, or product owned or controlled by a business in which you have a financial interest?
 NO YES

3. Are you currently receiving, or do you expect to receive in the next 12 months, USA-supervised sponsored research support or gifts (whether in dollars or in kind) for research from a business in which you or a member of your immediate family ("immediate family" means your spouse and dependent children) has a financial interest, other than royalty income to which you are entitled?
 NO YES

4. Are you currently receiving, or do you expect to receive in the next 12 months, research support (sponsored research or gift) from a business in which you or a member of your immediate family serves on the board of directors or advisory board?
 NO YES

5. Do you currently hold, or do you expect to hold in the next 12 months, an executive position or serve on a governing board in business engaged in commercial or research activities related to your research or administrative responsibilities? Please attach extra pages to answer the following a - d:
 NO YES
 - a. Name of enterprise:
 - b. Describe your responsibilities, and how much time you expect to dedicate to them.
 - c. Does the business or organization plan to submit proposals for federal funding? If so, please describe.
 - d. Does the proposal cover research that could be performed in your facilities at USA?

6. Excluding consulting activities that conform to USA's consulting policies, do you expect that in the next 12 months, while acting in the context of your USA responsibilities, you will make professional referrals to a business in which you or a member of your family has a financial interest?
 NO YES

7. Are you currently taking, or do you expect to take in the next 12 months, administrative action on behalf of USA with respect to any supported research activity (sponsored research or gift) in which you or a member of your immediate family has a financial interest?
 NO YES

Continued

Disclosure of Relationships with External Entities

8. Are any of your trainees (including students, post-doctoral fellows and other trainees) currently assigned, or do you expect to assign any trainees in the next 12 months, to research projects related to activities for which you are entitled to receive royalties under USA's royalty-sharing policies?
 NO YES
9. Are any trainees (including students, post-doctoral fellows, and other trainees) currently assigned, or do you expect to assign any trainees in the next 12 months, to a business in which you have a financial interest, other than royalty income or the entitlement to future royalty income under USA's royalty-sharing policies?
 NO YES
10. Are you currently employing, or do you intend to employ within the next 12 months, any graduate students in a business in which you or a member of your immediate family has a financial interest? If so, for each student, please set forth a) the nature of the work to be performed, b) how the work relates to the student's studies or thesis, and c) the expected number of hours per month. *(Please provide a complete statement on an additional page).*
 NO YES
11. Are there any other activities in which you may have a potential for conflict of interest that should be disclosed? *(Please provide a complete statement on an additional page.)*
 NO YES

II. Evaluation of Financial Interest in External Entities

Use the "Financial Disclosure Worksheets" to determine whether you, according the federal policy, have a significant financial interest regarding any external entity.

III. Disclosure of Relationships with External Entities and Significant Financial Interests Related to Extramurally Funded Research and Educational Activities

Federal regulations and USA policy require investigators to disclose significant financial interests

- (a) that are related to or would reasonably appear to be affected by the research or educational activities funded or proposed for funding; or
- (b) in external entities whose financial interests would reasonably appear to be affected by such activities.
1. List the entities in which you have significant financial interests and attach Financial Disclosure Worksheets for each entity.
 2. If you answered "Yes" to any question in Part I, "Relationships with External Entities," send this form to the Office of Sponsored Programs along with documentation.
 3. If you wish to apply for extramural funding and you have significant financial interests related to the research or educational activities proposed for funding, this form and the Financial Disclosure Worksheets must be included with the proposal package when presented to the Office of Sponsored Programs for final review. (Please place in sealed envelope marked "Confidential Disclosure Documentation.")

Signature

PI

Co-PI

Key Personnel

Date