

Instructions for Disclosing Significant Financial Interests (SFIs) Related to U. S. Public Health Service (PHS) Funded Research

What research funding sources require disclosure?

The disclosure requirement applies to all U. S. Public Health Service (including NIH, AHRQ, ATSDR, CDC, FDA, HRSA, IHS, and SAMHSA) sponsored research. This includes any application for, or the receipt of, such funding.

Which investigators must disclose Significant Financial Interests (SFIs)?

Anyone who is planning to participate in, or who is participating in, PHS-funded research must disclose SFIs. This includes (1) the principal investigator or project director; and (2) any other person, regardless of title or position, who is responsible for the design, conduct, or reporting of the research, or proposed for such PHS funding (which may include collaborators or consultants).

Whose SFIs must be disclosed?

Each investigator must disclose his/her own SFIs and the SFIs of the investigator's spouse and dependent children.

What if there is nothing to disclose?

If there are no SFIs to disclose, the investigator must so certify on the disclosure form. Please also indicate "No SFIs to Disclose" in the subject line of the e-mail message to which your disclosure form is attached.

Must the SFI be related only to the research in order to require disclosure?

An SFI must be disclosed if it reasonably appears to be related to the investigator's professional responsibilities on behalf of SU which fall within SU's institutional mission of research, education, or service (i.e. not just research). This includes activities such as research, research consultation, teaching, professional practice, institutional committee memberships, and service on panels such as the Institutional Review Board, Institutional Animal Care and Use Committee, or data and safety monitoring board or committee.

SFIs that must be disclosed include:

All financial interests of any amount/value from an entity related to any of your University responsibilities (not just research). These include financial interests of yours and of your spouse and dependent children which currently exist or existed within the past 12 months. It also includes travel during the past 12 months that was either paid on your behalf by the entity or reimbursed directly to you by the entity. Disclosures must be made at or before the time a

proposal is submitted through the University and within 30 days of the development of a new SFI.

Examples of financial interests that must be disclosed are:

- Remuneration of any value during the 12 months prior to the disclosure from any entity, such as:
 - Consulting or speaking fees
 - Honoraria
 - Salary or wages
 - Paid authorship
- Income during the 12 months prior to the disclosure from intellectual property rights and interests (e.g., patents and copyrights) unless the income derives from intellectual property rights assigned to UMB and paid under an agreement to share in royalties related to such rights
- Equity interest in any entity (such as stock or stock options or other ownership interests)
- 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) during the 12 months prior to the disclosure

SFIs that are *not* required to be disclosed are:

- Salary, royalties, or other remuneration paid by SU to the investigator if the investigator is currently employed or otherwise appointed by SU, including intellectual property rights assigned to SU and agreements to share in royalties related to such rights
- 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
- An asset in a blind trust, if the investigator does not know of the asset (e.g. it was purchased by the trust with proceeds from assets originally placed in the trust), and the trust is managed by an independent fiduciary
- 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 that is affiliated with an institution of higher education. **Note:** Foreign equivalents of these examples are **NOT** exempt and must be disclosed.
- Income from service on advisory committees or review panels of 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
- 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. **Note:** Foreign equivalents of these examples are **NOT** exempt and must be disclosed.

When is disclosure of SFIs required?

- At or before the time of submission of an application for PHS-funded research
- At least annually during the period of the PHS-funded research award, no later than sixty (60) days prior to the beginning of each fiscal year of such award
- Within 30 days of discovering or acquiring a new SFI (i.e., by purchase, marriage or inheritance)

Notes:

Financial interests (including payments and sponsored travel) in professional and scientific societies or associations must be disclosed.

Please include with your disclosure e-copies of any relevant documents, such as consulting agreements, shareholder agreements or licensing agreements.

Submit disclosures confidentially to: ttherberger@salisbury.edu. Questions concerning your disclosure may be submitted by e-mail, with your disclosure.