

**Financial Interests Disclosure Form for Investigators Not Affiliated with the University**

You are being asked to complete this disclosure because you have been identified as an investigatoron a research project under the oversight the University of Michigan (UM). This information is required in order for UM to meet its regulatory obligations to ensure that an investigator’s related financial interests are assessed for conflict of interest and, if needed, appropriate conflict management is implemented.

**Terms are defined and examples given in an Appendix attached to this document.** If you have any questions about UM’s Financial Conflict of Interest (FCOI) Policy or this form, please email COI.Support@umich.edu. Please provide complete typed responses to the requested information below.

**I. Research Identifying Information**

University of Michigan Reference # (e.g., PAF, HUM/IRB):

Proposal Title:

Sponsoring Agency Award # (if applicable):

**II. Non-Affiliated Investigator Contact Information**

Last Name, First Name:

Mailing Address:

Office Telephone #:

Email Address:

Employer Name:

Employer Address:

Title or position:

**III. Related Financial Interests**

You are required to share with us any financial interests that you, as well as your spouse, domestic partner, or dependents, may have in the past 12 months that is **related to the above-named project**.

A sample table and a list of examples is in the Appendix.

**Disclosure Table Instructions**

If you do not have any related financial interests put N/A in the first box of the Disclosure Table and go to section V. Make an entry in each column as follows (add another sheet if needed):

**Entity**: Provide the *full legal name* of the company or other organization. In most cases, there will be one name per line. An example of an exception to that could be a royalty interest where one entity owns the intellectual property (IP) and another has licensed it. For example, if USA University owns IP that you invented and licensed it to Big Pharma, Inc., you would enter USA University/Big Pharma, Inc.

**Activity/Interest***:* Include all the activities or interests that apply for the named entity. If the interest is that of a family member rather than yourself, so indicate (e.g., Spouse is Consultant)

* Activity examples: Consultant, Manager, Partner, Board of Directors, Scientific Advisory Board Member
* Interest examples: Salary, Stock, Stock Options, licensed IP, royalties, loan, travel expenses
	+ Note: Do not include stocks/stock options that are in mutual funds of diversified holdings which are professionally managed.

**Value or Compensation:** If you have more than one activity/interest for a single entity, you may need multiple entries in this column. If you list more than one, make it clear the activity/interest to which it applies (see sample table in Appendix). Do not include your salary as an employee.

For values less than $100,000 use the ranges below. If the value is $100,000 or more, you must enter the specific amount (e.g., $283,400). For equity/stock in a non-public company where value cannot be readily determined by public price or fair market value, enter “Equity Value Unknown.”

|  |  |  |
| --- | --- | --- |
| * + $0 (None)
	+ $1 - $4,999
	+ $5,000 - $9,999
 | * + $10,000 - $19,999
	+ $20,000 - $39,999
	+ $40,000 - $59,999
 | * + $60,000 - $79,999
	+ $80,000 - $99,999
 |

**Relationship to the Research**: Describe the way in which the activity/interest is related to the research.

|  |  |  |  |
| --- | --- | --- | --- |
| **Entity** | **Activity/Interest** | **Value or Compensation** | **Relationship to the Research** |
|       |       |       |       |
|       |       |       |       |
|       |       |       |       |
|       |       |       |       |
|       |       |       |       |
|       |       |       |       |
|       |       |       |       |
|       |       |       |       |

**IV. Travel Expenses**

If you included travel expenses for any of the entities above *and* the above named research is sponsored by a federal agency or other organization that requires the PHS federal FCOI regulations be followed (e.g., NIH--click here of a full list of agencies/: <http://research-compliance.umich.edu/agenciesorganization-following-phs-coi-regulations>), you must list reimbursed travel or travel that was paid on your behalf. You are only required to disclose travel that exceeds $5,000 from the same entity, in aggregate, within the past 12 months. DO NOT list travel that was paid or reimbursed by your employer, by the University of Michigan in connection with this research, by government agencies, or US institutions of higher education, or affiliated teaching hospitals, medical centers, or research institutes. If you need additional space, please attach a separate sheet.

|  |  |  |  |  |
| --- | --- | --- | --- | --- |
| **Travel sponsor** | **Travel purpose** | **Travel destination** | **# of Trips** | **Total # days** |
|       |       |       |       |       |
|       |       |       |       |       |
|       |       |       |       |       |
|       |       |       |       |       |

**V. Certification**

Please check the box to affirm:

[ ]  I have completed the NIH Financial Conflicts of Interest in Research Training Course at: <http://grants.nih.gov/grants/policy/coi/fcoi_web-based_tutorial.pdf>. *This is required if the research is sponsored by a federal agency or other organization that requires the PHS federal FCOI regulations be followed (e.g., NIH--click here of a full list of agencies/:* <http://research-compliance.umich.edu/agenciesorganization-following-phs-coi-regulations>).

[ ]  I have read and understand the University of Michigan Policy for Identification and Management of Conflicts of Interest in Research, Sponsored Projects, and Technology Transfer at: <https://research-compliance.umich.edu/files/coiresearchpolicyfy2021pdf>. *This is required for all investigators.*

By submitting this information, I certify that the above information is complete and true to the best of my knowledge. I acknowledge that should my financial interests, or those of my family members, change in a way that results in different answers to any of the questions asked in this disclosure, I will submit updated information. I will comply with these and any other disclosure requirements imposed by the University of Michigan. I understand that should the University determine a conflict management plan is needed that I must agree to that plan in order to participate in the research.

Signature: \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ Date: \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

If you have any questions regarding completion of this form or our FCOI policy, please email COI.Support@umich.edu.

**APPENDIX**

**Sample Disclosure Table**

|  |  |  |  |
| --- | --- | --- | --- |
| **Entity** | **Activity/Interest** | **Value or Compensation** | **Relationship to the Research** |
| Big Pharma, Inc. | Wife is a Consultant | $5,000 - $9,999 | Big Pharma, Inc. makes one of the compounds tested in this research. She consults with them about this product.  |
| Little Company, LLC | Stocks (about 2%)Royalties | Equity Value Unknown$1 - $4,999 | I am a research scientist. Our company owns IP rights on the other compound tested in this research. I am the inventor but there have not received in royalties or other payments. I receive royalties for a different invention, one that is not involved in this project. |
| General Stuff | Stock (3000 shares) | $60,000 - $79,999 | We use GS software in this research. The research is not testing the software which has been on the market for more than a decade. |

**Definitions**

***Activities.*** These are roles in which you provide a service such as membership on the governing board of an entity, service on its board of directors, service on a scientific advisory board, work as a consultant, or having a position of authority or responsibility to act in the best interest of the entity, including being an officer, manager, or partner.

***Equity Interest.*** Ownership interests or securities, including but not limited to shares of stock or securities; stock options; warrants or any other rights to purchase stock or securities; debt instruments; partnership interests in a general or limited partnership; or membership interests in a limited liability company.

***Family Member.*** An investigator’s spouse, domestic partner, or dependent child.

***Intellectual Property Interest.*** A property or other financial interest in the product including, but not limited to, a patent or patent portfolio, trademark, copyright or licensing agreement, contract rights, or the right to receive compensation in connection with the development or sale of the product (e.g., royalties). IP Interest does not include authorship of a work or inventorship of a patent where the author or inventor has no right to receive compensation in connection with the use or exploitation of the work or patent.

***Interest.*** For purposes of this form, the term refers to financial interests. Anything of monetary value, whether or not the value is readily ascertainable, including but not limited to, any ownership, equity or investment interests, compensation arrangements, intellectual property rights and fiduciary responsibilities.

***Related***. An interest or activity is “related” when either the value of your interest could be directly or indirectly affected by the research project or the interest has the potential (in reality or perception) of creating bias in the conduct of the research. These are examples of interests and how they could be related to and affected by a research project

|  |  |
| --- | --- |
| Intellectual Property/Invention/Marketed Product* The research is testing the invention or product; i.e., it is directly related to the hypothesis. The outcome of the research will impact the worth of the invention with regard to a particular use. If the research shows the invention has promise, the inventors, the entities that own the IP or have licensed it stand to gain financially.
* Although the invention or product is not the object of the research per se, the research could not be done without the invention or product, and the research could make it more marketable.
* The research could be done without this invention or product (by using another product) but the investigators prefer to use it.
 | Equity/Stock/Stock Options* This type of interest becomes important when the company has rights to the invention or product tested in the research. If the product is successful, the company and equity holders stand to gain.

Consulting Activity* This type of interest becomes important when the research is testing a company’s product/IP and the research has the potential to increase the value of the product/IP. When an investigator also serves as a consultant for such a company, there could be the potential for bias or the appearance of bias.
 |