Training for the Disclosure and Management of Significant Financial Interest (SFI) at the University of Michigan Training (“SFI Training”)

U-M and unit-level policies require you to disclose information about your non-University (“outside”) interests, activities, and relationships that are related to your University (“institutional”) responsibilities. These requirements help you and the University to comply with State of Michigan and federal conflict of interest regulations and ethical standards. As you complete your outside interest disclosure in M-Inform, you are agreeing to follow these requirements and policies.

Key definitions

- **Outside Interest** – any paid or unpaid interest, activity, or relationship with an outside organization.
- **Outside Organization** – an organization other than the University of Michigan; may be domestic or foreign, public or private, for-profit or non-profit.
- **Related to you institutional responsibilities** – an interest, activity, or relationship that relies upon the same expertise used to carry out your University responsibilities; as well as any interest, activity, or relationship of yours, your spouse, domestic partner, and/or dependents that has the potential to influence your University work (i.e., your professional responsibilities on behalf of the University, such as purchasing, research, teaching, professional practice, and institutional committee membership).
- **Significant financial interest (SFI)** – when an outside interest, consisting of one or more of the following interests held by you, your spouse, domestic partner, and/or dependents, reasonably appears to be related to your institutional responsibilities:
  - Remuneration received from any publicly traded entity in the previous 12 months and the value of any equity interest in the entity that, when aggregated, exceed $5,000 (lesser amounts must still be reported to the University).
  - Remuneration received from any non-publicly traded entity (including non-profit organizations) in the previous 12 months that, when aggregated, exceed $5,000 (lesser amounts must still be reported to the University).
  - Any equity interest in a non-publicly traded entity.
  - Any income received from intellectual property (IP) rights and interests (e.g., patents, copyrights, and royalties from such rights).
  - Certain reimbursed or sponsored travel paid to or on behalf of the investigator, except that paid for by a federal, state, or local government agency, a domestic non-profit institution of higher education, an academic teaching hospital, a medical center, or a research institute affiliated with an institution of higher education.

Be familiar with these conflict of interest (COI) policies

UM Policies:
SPG 201.65.1 – Conflicts of Interest and Conflicts of Commitment

U-M Policy for Identification and Management of Conflict of Interest in Research and Technology Transfer (updated in 2016)

Unit Specific Policies:
http://www.provost.umich.edu/programs/COI_COC/units.html

Common Federal Policies:
PHS (NIH) - Promoting Objectivity in Research
NSF – Conflict of Interest Policies

State of Michigan Statute:
Contracts of Public Servants with Public Entities

These and other related policies and resources:
http://research-compliance.umich.edu/coi-policies
Outside interest examples:
The following lists some, but not all, common types of relationships with an outside organization that are required to be disclosed. Remember, the activity must be related to your University responsibilities.

- Consultant, scientific advisory board member (paid or unpaid advisory role)
- Board of directors member, manager, trustee, president, CEO (paid or unpaid leadership role)
- Equity, stock/stock options in non-publicly or publicly traded organizations, including U-M start-up companies
- Inventor of licensed or optioned intellectual property, developed at U-M or elsewhere, regardless of royalty or patent status
- Honoraria, compensation, or items of value received for employment, lecturer, editor, etc.

Disclosure process:
Read the M-Inform pages carefully. Exceptions and unit requirements are noted that may impact your disclosure activity. Use the decision tree (found here) as you consider your answers. After you submit your disclosure, it is routed automatically for review by the person who oversees your University responsibilities and to other University offices that screen the information to determine whether any additional requirements must be addressed.

**Important! Update your disclosure within 30 days of any change**, including the acquisition or initiation of any new outside interest that is related to your institutional responsibilities.

☐ I certify that I have read all of the SFI Training materials on this page and have reviewed the policies referenced from the associated links. (Required for Submission)
Disclosure Update for [Name] : Triage Questions

University policy requires disclosure of any outside interests, activities, or relationships that relate or are similar to your U-M responsibilities or area of scholarship. Select all of the following that apply to you, your spouse, domestic partner, and/or dependent(s) (include anything for the past 12 months or the next 30 days):

Do not include any salary, grants, contracts, or sponsored activities that you receive from or through the University of Michigan. If you are still uncertain whether or not you need to disclose an activity, please email coi.support@umich.edu.

☐ Paid or unpaid outside activities or relationships (including foreign affiliations and medical-volunteer activities)
  Examples requiring disclosure:
  • Appointment or visiting scholar at a foreign institution
  • Consulting or advisory role (e.g., scientific, strategic, or medical advisory board)
  • Service on a Board of Directors or as a Corporate Officer or Trustee
  • Consulting for a federal funding agency or federal committee
  • Spouse, domestic partner, or dependent works/consults for a company that sponsors your research
  • Received payment from a professional society

 Exceptions not requiring disclosure:
  • Membership in a professional society
  • NIH/NSF or other federal agency study section or U.S. government proposal review committee
  • Officer in Parent-Teacher Association
  • Boy/Girl Scout Leader

☐ Ownership in a company or business (including equity, stock, or stock options)
  Examples:
  • Company that sponsors university research
  • Company doing business with U-M
  • Vendor/supplier that does business with U-M
  • Start-up company

 Exceptions not requiring disclosure:
  • Income from investment vehicles, such as mutual funds and retirement accounts, as long as you do not directly control the investment decisions made in these vehicles.
Intellectual Property that is optioned, licensed, or marketed

Examples:
- Royalties (including royalties paid through the U-M)
- Marketed software apps
- Milestone payments
- Option fees

Exceptions not requiring disclosure:
- Book royalties

Received payment, compensation, loan, or items or value

Examples:
- Payment from the Chinese Thousand Talents Program or other Talents Programs
- Research support (e.g., grants/contracts) from a foreign entity that did not route through U-M
- A loan from a company that also sponsors research at U-M
- Consulting fees from a company
- Gift of phone from telecommunications company

Exceptions not requiring disclosure:
- Student loans

Travel expenses reimbursed directly to you by an outside organization:

Disclosure is required for the following faculty and staff or circumstance:
- U-M Health System, College of Pharmacy, Life Sciences Institute, and Taubman College of Architecture & Urban Planning: all travel regardless of value
- School of Dentistry or School of Kinesiology: all travel that exceeds $5,000 from the same outside organization (other than the exceptions below), in aggregate, within the last 12 months.
- Individuals (other than those above) who have or expect funding from agencies that follow the Public Health Services (PHS) FCOI guidelines (e.g., NIH) must disclose travel that exceeds $5,000 from the same outside organization, in aggregate, within the last 12 months.

Exceptions not requiring disclosure: Travel paid for by a:
- U.S. federal, state, or local government agency
- U.S. accredited non-profit institution of higher education or its affiliated teaching hospital, medical center, or research institute
- Sponsored research project/grant or otherwise paid solely by U-M

None of the above
Do you have a spouse, domestic partner, and/or dependent(s) currently employed at U-M?

- Yes
- No

Click Add to enter your family member below using their uniqname or by last name.
If you are unable to find your family member, use the Create New User button in the “User Not Found” help box below to create their M-Inform account. Once the M-Inform account has been created, click the Add button to locate and select your family member below.

<table>
<thead>
<tr>
<th>Name</th>
<th>Uniqname</th>
<th>Department</th>
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</thead>
<tbody>
<tr>
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</table>

There are no items to display

User not found?
Try the following:
- Search on Last Name
- Verify exact uniqname

Still not found?
Create New User
Disclosure Update for [Name]: Disclosure Details

If the disclosure information listed below is correct, click **Sign and Submit**.

If the information listed below needs to be updated, select one of the following options:

- Click “Add Disclosure” to report a new outside interest, activity, and/or relationship
- Click “Edit” to update an existing disclosure
- Click “Remove” to delete a disclosure that is no longer active
- Click “Re-Open” to restore a disclosure marked “Pending Removal”
- Click “Restore” to restore an inactive disclosure
- Disclosures marked “Pending Removal” will be inactivated when the “Sign and Submit” activity is completed.

*Remember to check ‘Disclosures Pending Review’ and ‘Reviewed Disclosures’ for accuracy.*

- If you are ready to sign and submit your disclosure now, you must click the **Sign and Submit** button below.
- To save your changes and submit your disclosure at a later time, click **Save** and then click **Exit**.

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**Disclosures Pending Review:**

<table>
<thead>
<tr>
<th>View/Edit</th>
<th>Organization</th>
<th>Relationship</th>
<th>Role</th>
<th>Start Date</th>
<th>End Date</th>
<th>Ongoing?</th>
<th>Days</th>
<th>Total Value</th>
<th>Last Updated</th>
<th>Remove</th>
</tr>
</thead>
<tbody>
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<td>Self</td>
<td>Editor</td>
<td>no</td>
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<td><img src="remove-icon" alt="Remove" /></td>
</tr>
</tbody>
</table>

**Reviewed Disclosures** (click ‘Modify’ to enable editing):

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<tr>
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<th>Organization</th>
<th>Relationship</th>
<th>Role</th>
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<th>End Date</th>
<th>Ongoing?</th>
<th>Days</th>
<th>Total Value</th>
<th>Last Updated</th>
<th>Remove</th>
</tr>
</thead>
</table>

There are no items to display

**Inactive Disclosures:**

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<tr>
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<th>Organization</th>
<th>Relationship</th>
<th>Role</th>
<th>Start Date</th>
<th>End Date</th>
<th>Ongoing?</th>
<th>Days</th>
<th>Total Value</th>
<th>Last Updated</th>
<th>Remove</th>
</tr>
</thead>
</table>

There are no items to display
Create New Disclosure

Select the outside organization involved in this interest, activity, or relationship:

If you are unable to find the outside entity, please enter the legal name of the outside organization:

OK  Cancel
[Entity Name] Disclosure for [Name]

* 1. **Activity, interest, or relationship** is for:
   - Self
   - Spouse/Domestic Partner, or Dependent
   - Both (Self and Family Member)

   Clear

* 2. **The outside organization** involved in this interest, activity or relationship is:
   - Publicly Traded
   - Non-Publicly Traded
   - Other (non-profit, federal government, etc.)

   Clear

If this outside organization has operated under a different name, please enter the previous name(s) below:

[Input field for previous names]
[Entity Name] Disclosure for [Name]

3. Time period of interest, activity, or relationship:
   - Start date:
   - Select if ongoing: ☐
   - If not ongoing, end date:

4. Estimate professional effort (in days) engaged in this interest, activity, or relationship for the current fiscal year (ending June 30)*
   For example, if you expend 12 hours on professional activity in a given day, and 6 of those hours were on your outside interest, activity, or relationship, you should calculate 0.5 days spent engaged in the outside interest, activity, or relationship; if you spend 0.5 days six times in the year, enter 3 days. If the outside interest involved no time spent (e.g., royalties, stock ownership, activity was conducted by spouse), enter 0 days.
   - Estimated Days:

*Please note that the total days spent on all outside activities should not exceed unit business rules (e.g., no more than 4 days per month or 48 days per year).
5. Please select all of the following descriptors that apply to the interest, activity, or relationship with the outside organization:

☐ Consultant/Advisory Role

Please select your Consultant/Advisory Role:

☐ Consultant
☐ Scientific Advisory Board
☐ Strategic Advisory Board
☐ Medical Advisory Board
☐ Governmental Agency Consultant or Advisory NOT including NIH, NSF, or other federal agency study sections or proposal review committees.

You indicated consultant, is there a written agreement?

Note: Medical School faculty members are required to have a written contract with clear deliverables, a copy of which must be made available upon request.

☐ Yes  ☐ No  Clear

If you selected Advisory, Strategic, Scientific or Medical Board; and/or Government Agency role, please describe below:

☐ Intellectual Property (e.g., Royalties, Milestone, Option Fees, etc.)
☐ Leadership Role (e.g., Trustee, Manager, President/CEO, Board of Directors)

☐ Trustee
☐ Manager
☐ President/CEO
☐ Board of Directors

You have selected Board of Directors. Please enter your role below (e.g., Member, Secretary, Treasurer, President, etc.):

☐ Expert Witness
☐ Employee
Honoraria/Academic Speaker (Does not include speakers bureau activities, which are prohibited by Michigan Medicine)

Loan to or from outside organization

Lecturer (e.g., teaching a course)

Equity interest for Non-Publicly traded outside organization (e.g., stock, stock option, other ownership or partnership interest)

Please select the equity interest % ownership for the non-publicly traded organization:

- Less than 5%
- 5% or greater

Equity interest for Publicly traded outside organization (e.g., stock, stock option, other ownership or partnership interest)

Please select the equity interest % ownership:

- 0 – 1%
- 1% - 5%
- > 5%

Travel

Volunteer/Community Service

Editor

Other (e.g., honorary appointments or directorships at foreign institutions, etc.)

You indicated other, please describe your involvement with your interest, activity or relationship with the outside organization:

6. Provide details about this interest, activity, or relationship. Explain how it is separate from, relates to, or overlaps with your U-M responsibilities or area of scholarship, etc.
7. Travel expenses reimbursed to you from or paid directly by the outside organization: Enter information about each trip on a separate line in the table below. THIS INFORMATION MUST BE ENTERED WITHIN 30 DAYS OF EACH TRIP. (Exceptions: Do not include travel paid for by a US Federal, state or local government agency; and accredited domestic non-profit institution of higher education; an academic teaching hospital, medical center, or a research institute that is affiliated with an accredited domestic non-profit institution of higher education. Also do not include travel paid for by a sponsored project/grant.)

Only required for the following:

- Individuals who have or expect funding from NIH or other agencies that follow the Public Health Services (PHS) FCOI guidelines are only required to disclose travel that exceeds $5,000 from the same outside organization, in aggregate, within the last 12 months.
- Employees of the U-M Health System, College of Pharmacy, Life Sciences Institute, and Taubman College of Architecture & Urban Planning are required to disclose all travel of any amount other than the exceptions.
- Employees of the School of Dentistry or School of Kinesiology are required to disclose all travel that exceeds $5,000 from the same outside organization, in aggregate, within the last 12 months, other than the exceptions.

Click the Add button to enter travel information. To make changes, click on the destination name of the information to be changed:

<table>
<thead>
<tr>
<th>Date</th>
<th>Duration</th>
<th>Destination (city, state, country)</th>
<th>Purpose</th>
<th>Event Organizer (if other than the outside organization)</th>
</tr>
</thead>
<tbody>
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There are no items to display

Upload travel related documentation here. Click the Add button to upload a new document. To upload a revised version of a document already listed below, click the Upload Revision button next to the document to be revised and upload the revised document:

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<thead>
<tr>
<th>Name</th>
<th>Version</th>
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There are no items to display
[Entity Name] Disclosure for [Name]

8. Select the range of aggregated value received in the past 12 months:

Indicate the value of all outside compensation and equity. If any amount of the equity is uncertain, indicate the known portion of the total value and check the Equity Value Unknown box below.

Report the range of value received from the outside organization other than travel. If travel is the only interest, activity, or relationship with the outside organization (in question #5), select ‘$0 (None)’ and continue to the next question.

Equity Value Unknown (cannot be readily determined by public price or fair market value) □

Range of value received:

- $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
- $100,000 or more

Enter amount if $100,000 or more was selected: __________
9. Is the interest, activity, or relationship with the outside organization related to your research activities in any of the following ways?

Contact coi.support@umich.edu if you need assistance answering this question.

The outside organization is:

- Supporting a research project
- Supplying products purchased with research funding
- Providing a product used in a research project (e.g., an app, device, drug, compound, software, survey, evaluation)
- Holding an option/license to intellectual property (e.g., device, drug, compound, software, survey, evaluation) that you, your spouse/partner, or dependent developed [that is] being used in a research project
- Receiving a subcontract for work on a research project
- Involved in a research project in some manner not listed above

* Yes  ○ No  Clear

* 9.1. Does the research involve human subjects?

○ Yes  ○ No  Clear
Attestation:

- I am aware of and agree to abide by the UM policies and guidelines governing outside interests, conflict of interest and conflict of commitment.
- I confirm that this disclosed interest, activity, or relationship abides by the limits specified in these policies and guidelines and does not interfere with my primary obligation to UM. This disclosed interest, activity or relationship does not involve more than incidental use of UM resources (e.g. facilities, personnel, equipment, etc.) and does not involve outside activities (including education, research, clinical, administrative, and collegial obligations) that would more appropriately be performed within UM.
- I certify that this information provided is accurate to the best of my knowledge.
- I will update this disclosure promptly (within 30 days) if my circumstances change.
- I understand that failure to fully and honestly disclose may result in disciplinary action up to and including termination.
- I understand that I may be contacted by a UM COI Office to discuss this disclosure up to and including the establishment of a management plan for the interest.

Once you accept the attestation above and click OK, your disclosure(s) will be routed to the appropriate reviewer.

Click CANCEL to cancel this activity and close this window.