

# Significant Financial Disclosure (SFI) Form

## INVESTIGATOR FINANCIAL & OTHER PERSONAL INTERESTS DISCLOSURE FORM

[This form includes Adobe Digital Signature Functionality - See FAQ for Adobe Digital Signature Information Frequently](#)

[Asked Questions \(FAQs\) located on pages 4 & 5](#)

Version Date: 07/29/2019

PROJECT TITLE			
PRINCIPAL INVESTIGATOR	DEPARTMENT	PHONE	
FUNDING AGENCY OR SPONSOR		TOTAL REQUESTED BUDGET	REQUESTED START DATE
TYPE      Research      Training/Education      Service      Other:			

This disclosure is an:

- Initial disclosure for a proposal / application
- Update to existing disclosure for ongoing, existing proposal / application – New personnel, change in SFI, newly acquired SFI
- Annual update to an existing disclosure with no changes Annual
- update to an existing disclosure with changes

Does any of your research involve use of human research subjects? Yes      No **Significant**

**Financial Interest means the following:**

A. In the 12 months preceding this disclosure, did anyone, including any individual's spouse/domestic partner and/or dependent children, listed on this disclosure form receive remuneration related to their institutional responsibilities from a publicly traded entity or non-publicly traded entity, when aggregated, exceeds \$5,000? <i>Examples: Salary, Payment for Services, Consulting Fees, Honoraria, Paid Authorships, Gifts, Gratuities, Compensation for Services on Advisory Panel/Committee or Review Panel/Committee or Providing Expert Testimony</i>
B. In the 12 months preceding this disclosure, does anyone, including any individual's spouse/domestic partner and/or dependent children, listed on this disclosure form hold any equity interest in a publicly traded entity or non-publicly traded entity, when aggregated, exceeds \$5,000? <i>Examples: stock, stock option, or other ownership interest</i>
C. In the 12 months preceding this disclosure, did anyone, including any individual's spouse/domestic partner and/or dependent children, listed on this disclosure form receive any income related to intellectual property rights and interest <u>not assigned by Rowan University</u> and/or intellectual property rights and interest (royalties) other than Rowan University, related to your institutional responsibilities?
D. In the 12 months preceding this disclosure, did anyone, including any individual's spouse/domestic partner and/or dependent children, listed on this disclosure form, engage in travel related to your institutional responsibilities that was paid for on your behalf (and not reimbursed to you so that the exact monetary value may not be readily known) by a sponsoring/reimbursing entity other than a / an: <ul style="list-style-type: none"> <li>• Federal, state, or local government agency</li> <li>• Institution of higher education as defined at 20 U.S.C. 1001(a)</li> <li>• Academic teaching hospital</li> <li>• Medical center</li> <li>• Research Institute that is affiliated with an institution of higher education</li> </ul>
E. <b>DHHS/PHS NIH Sponsored Projects ONLY</b> In the 12 months preceding this disclosure, does anyone, including any individual's spouse/domestic partner and/or dependent children, listed on this disclosure form receive remuneration related to their institutional responsibilities from a <u>foreign institution of higher education or foreign government</u> ?  <i>Examples: Salary, Payment for Services, Consulting Fees, Honoraria, Paid Authorships, Gifts, Gratuities, Compensation for Services on Advisory Panel/Committee or Review Panel/Committee or Providing Expert Testimony</i>

If any of your answers to Questions A - E above is "No", then complete, sign, date and submit page 1 and page 2 (Form A -see below). Nothing more is needed.

If any of your answers to Questions A – E above is "Yes", then complete, sign, date, and submit page 1, page 2 (Form A) and page 3 (Form B).

**FINANCIAL CONFLICT INTEREST DISCLOSURE**

**FORM A**

By signing below, individuals certify that the information on this form is correct; that they have read and understood the Rowan University Conflict of Interest Policy; that, to the best of their knowledge, all required disclosure of financial and other personal interests has been made herein; that they will complete a Disclosure Form on an annual basis during the duration of the research, or more frequently as new interests are obtained or if their situation with respect to potential conflict of interest changes since the most recent disclosure, and submit it to the Office of Sponsored Programs and Office of Research Compliance; that they will comply with any conditions or restrictions imposed by Rowan University to manage, reduce or eliminate conflicts of interest caused by any interests. By signing below, individuals certify that the information provided in the table titled: Significant Financial Interests for any and all individuals that have indicated a significant financial interest exists is accurate and up to date. Principal or Primary Investigator(s), acknowledges that anyone's signature below indicates they are aware that any significant financial interest meeting the criteria must be reviewed, a final determination whether or not a financial interest is a conflict, and development of any and all management action plans associated with a Financial Conflict of Interest (FCOI) must be adhered to and followed accordingly. They are aware that any changes in the reported Significant Financial Interest (SFI), a newly acquired SFI, or FCOI needs to be reported immediately and a new conflict of interest disclosure form completed and submitted to the Office of Research Compliance. For PHS agency and office funded projects, disclosure of the financial conflict of interest and management action plan must be documented and submitted to the PHS agency and office via eRA Commons.

**If your study has more investigators than what is provided below, then submit multiple Forms A, listing all investigators**

NAME (PRINT & SIGN) <small>(see definition of "investigator" on page 4)</small>	NO	YES	DATE	NAME (PRINT & SIGN) <small>(see definition of "investigator" on page 4)</small>	NO	YES	DATE
PRINCIPAL INVESTIGATOR:				"INVESTIGATOR:"			
Signature: <input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		Signature: <input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
"INVESTIGATOR:"				"INVESTIGATOR:"			
Signature: <input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		Signature: <input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
"INVESTIGATOR:"				"INVESTIGATOR:"			
Signature: <input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		Signature: <input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
"INVESTIGATOR:"				"INVESTIGATOR:"			
Signature: <input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		Signature: <input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

This project involves a contract, subcontract or collaboration with an outside institution or group.

Attached is a written assurance from an appropriate official of this outside entity that individuals from the outside entity who will participate in this project comply with the outside entity's investigator conflict-of-interest policy and that such policy meets the requirements of the PHS (42 CFR Part 50, Subpart F).

In the event the outside entity has no investigator conflict-of-interest policy, attached are a written assurance from an appropriate official of this outside entity that individuals from the outside entity who will participate in this project comply with Rowan University's Conflict of Interest policy, plus all Rowan University Disclosure Forms completed by these individuals.

Does this project include international collaborations, foreign governments, or foreign institutions of higher education?  Yes  No

If yes, please provide the names of the collaborator(s) and the collaborating Institution below:

Click or tap here to enter text.

**Department signatures must be obtained after all investigators listed have been listed on this form, completed Form A & Form B (if applicable) and signed the disclosure Primary Investigator Department Chair (or Dean) or Supervisor signature would go into the first signature line**  
**If multiple departments are included in the project, then Co-Investigator's Department Chair (or Dean) or Supervisor signature is included in addition to Primary Investigator's Department signature.**

\_\_\_\_\_  
\*Signature of Department Chair (or Dean if investigator is Chair) or Supervisor

\_\_\_\_\_  
Date

\_\_\_\_\_  
\*\*Signature of Department Chair (or Dean if investigator is Chair) or Supervisor

\_\_\_\_\_  
Date

\* - Single Department Project - Only one Department signature is required

\*\* - Multiple Department Project - Multiple Department signatures are required

**FINANCIAL CONFLICT OF INTEREST DISCLOSURE  
FORM B**

Please complete this form if there is a significant financial interest. If there are more than one conflicted person on the project, you may download this form to include additional personnel.

<b>Significant Financial Interests (SFI)</b>			
<b>Name of Investigator:</b>			
<b>Entity Name:</b>			
<b>Remuneration and Type of Financial Interest</b>	<b>Check below if SFI is related to the Investigator</b>	<b>Check below if SFI is related to the Investigator's spouse/domestic partner and/or dependent children</b>	<b>Amount / Value</b>
Salary			
Payment for Services			
Consulting Fees			
Honoraria			
Paid Authorships			
Service on Advisory Committee			
Service on Review Panel			
Expert Testimony			
Gifts			
Gratuity			
Stocks			
Stock Options			
Other Ownership Interests			
Royalty Payments			
<b>Sponsored Travel</b>			
<b>Purpose of Trip:</b>			
<b>Destination:</b>			
<b>Dates of Trip:</b>			

Additional / Other Information related to SFI listed above, including but not limited to the following – a) Primary business of Entity, b) Nature of work that is performed for the Entity, c) Statement as to what space/facilities or equipment is used by the Entity (if Entity is not utilizing and space/facilities or equipment, then state that in the box below), d) How does the relationship with the entity relate to your Rowan responsibilities, and e) how does the relationship with the entity relate to the proposed research.

Enter Below:

**Definitions and Instructions**

This form does not supersede or replace the requirements for other additional or outside compensation and conflict of interest policies that are related to another Rowan University College, School, or other Division/Department/Office.

**Institution means** any domestic or foreign, public or private, entity or organization (excluding a Federal agency) that is applying for, or that receives, research funding

**Institutional responsibilities** means an Investigator's professional responsibilities on behalf of the Institution, and as defined by the Institution in its policy on financial conflicts of interest, which may include for example: activities such as research, research consultation, teaching, professional practice, institutional committee memberships, and service on panels such as Institutional Review Boards or Data and Safety Monitoring Boards.

**Investigator** means anyone who participates in the design, conduct, or reporting of an externally-funded research or scholarly project, regardless of that person's discipline, title, or position. Depending on the project, this could include postdoctoral associates, staff, students, outside consultants and faculty collaborators at other institutions.

**Principal Investigator** means any person, regardless of title or position, who is responsible for the design, conduct, or reporting of research

Please note that Public Health Service agencies and offices and National Science Foundation sponsored projects requires reporting of all significant financial interests.

### **Regulation and Policy and Procedure Citation**

*PHS – 42 CFR; Chapter 1, Sub-Chapter D; Grants, Part 50 Subchapter F – Promoting Objectivity in Research*

*NSF – Proposal & Award Policies & Procedures Guide; Part II; Section IX Grantee Standards; Subsection A – Conflict of Interest Policies*

## Frequently Asked Questions

### **How do I obtain an Adobe Digital Signature?**

Use Citrix application to use Adobe Acrobat Pro DC, if Adobe Pro is not available/downloaded on your device. Open up Adobe Acrobat Pro DC and use the Sign & Fill tool to create your Digital Signature.

- 1) Choose the Fill & Sign tool from the Adobe Sign dashboard and open the document you need to sign.
- 2) Click the Sign/Sign & Fill tool, then Add Digital Signature. Please note that digital signatures must be enabled by your Adobe Sign administrator.
- 3) Select cloud-based digital ID certificate, then click Apply.
- 4) Select the name of your digital ID certificate provider, or click the link to get a new digital ID.
- 5) Follow the prompts to obtain and affix your digital certificate.
- 6) Select Click to Sign, then enter your PIN, plus additional verification if required, such as a one-time passcode. Rowan University - IRT

Citrix Webpage - <https://irt.rowan.edu/services/software/index.html#cloud>

### **Who is required to complete this disclosure form?**

Any individual, regardless of title or position, who is responsible for the design, conduct, or reporting of research funded by any external source. This may include, for example, collaborators or consultants.

### **What are an individual's Institutional responsibilities?**

An individual's professional responsibilities on behalf of Rowan University that includes Faculty, research scientists and staff

### **What is a financial conflict of interest (FCOI)?**

A financial conflict of interest (FCOI) is a situation in which significant financial interests (SFIs) might compromise or reasonably appear to compromise the objectivity of someone's professional judgment. These include:

- a. Equity ownership in a publicly-traded company (at the time of disclosure) *or* compensation from a publicly-traded company (in the twelve months prior to disclosure) with an aggregated value of \$5000 or more.
- b. Any equity ownership in a non-publicly-traded company (at the time of disclosure) *or* compensation from a non-publicly-traded company (in the twelve months prior to disclosure) with an aggregated value of \$5000 or more.
- c. Intellectual property rights and interests, excluding rights from scholarly works but including rights to teaching materials.
- d. Any reimbursed or sponsored travel paid for by an entity with interests related to an individual's institutional responsibilities. *For example: Suppose a Rowan University faculty member is researching materials patented by company XYZ, and the faculty member owns \$10,000 worth of XYZ stock. That is an SFI.*

These provisions apply both to the individual and his or her spouse and/or dependent children. SFIs do not include compensation from Rowan University, other local, state, or federal governments, government institutions or agencies, and investments in which the individual has no control over investment decisions.

### **What are examples of Significant Financial Interests?**

Significant financial interests (SFIs) include equity ownership and/or salary in excess of \$5,000 from certain companies, intellectual property rights upon receipt (excluding scholarly works but including teaching materials), and travel paid for by non-governmental entities. So, for example, suppose a Rowan University faculty member is researching materials patented by company XYZ, and the faculty member owns \$10,000 worth of XYZ stock. That is an SFI.

### **Why does the disclosure form ask about the Significant Financial Interests of my family members?**

According to federal regulations, an individual's significant financial interests (SFIs) include those of immediate family members.

**Why does The University have a policy and procedures on Financial Conflicts of Interest?**

Financial Conflicts of Interest (FCOIs) can damage the objectivity of research and scholarship; therefore, the University has a responsibility to reduce their potential influence. Regulations from Health and Human Services (HHS), the National Science Foundation (NSF), other select federal agencies, and selected non-governmental funding organizations may impose additional requirements.

**Where can I find Rowan's policy on Financial Conflicts of Interest?**

The policy is found on the following link: <https://confluence.rowan.edu/display/POLICY/Research>

**I do not receive any federal funding for my work. Do I still need to complete a disclosure form?**

Yes. It is appropriate for the University to be aware of employees' FCOI since they can interfere with individuals' institutional responsibilities. Reporting FCOI makes the process minimally onerous and avoids unnecessary confusion about who needs to report what and when.

**When does Financial Conflict of Interest disclosure need to occur?**

Disclosure forms are to be completed annually, and when necessary, updated disclosures need to be completed within 30 days of a change in financial status. A change in "financial status" occurs whenever, 1) a covered individual's significant financial interest change, 2) an individual becomes an investigator on an externally funded or proposed project and the sponsor requires such disclosure, or 3) an individual acquires a new financial interest.

**Do I need to disclose Significant Financial Interests even when I am sure there is no interference with my institutional responsibilities?**

Yes. According to best practices and federal regulations, whether a significant financial interest (SFI) constitutes a financial conflict of interest (FCOI) is determined by the Conflict of Interest Review Committee.

**Will I need to give up any Significant Financial Interests I disclose?**

Probably not. Not all significant financial interests (SFIs) are financial conflicts of interest (FCOIs) and often FCOIs can be effectively managed without relinquishing the interests or recusal from the situation.

**What happens after I disclose a Significant Financial Interest?**

The Conflict of Interest committee determines whether or not a significant financial interest (SFI) constitutes a financial conflict of interest (FCOI). If an SFI is an FCOI, the investigator must agree to a resolution plan/management plan with input from the committee. There are different ways of appropriately managing FCOIs; the best approach in a particular case will depend on the situation.

**Who will see the information I disclose?**

Initially, positive Significant Financial Interest (SFI) disclosures will be reviewed only by the Office of Research Compliance or the Sponsored Program Office. At their request, the Conflict of Interest Review Committee may help determine whether disclosed SFIs are financial conflicts of interest (FCOIs). Completed disclosures are stored on a secure, confidential drive.

**Where will I get additional information on FCOI?**

From the Office of Research Compliance at 856-256-5853 or Office of Sponsored Program at 856-256-4057