

UNIVERSITY OF NEW HAMPSHIRE
FINANCIAL CONFLICT OF INTEREST IN RESEARCH DISCLOSURE STATEMENT

See the UNH Policy on Financial Conflict of Interest in Research at <http://usnholpm.unh.edu/UNH/VIII.Res/E.htm> for complete information; see reverse side of this form for policy summary, definitions of terms, and procedures. If you have any questions, please contact the Office of the Vice President for Research at 862-1948.

NAME _____ **DEPARTMENT** _____

PROPOSAL TITLE _____

PROPOSAL SUBMITTED TO _____

POSITION ON PROJECT _____

(Principal Investigator, Co-Investigator, etc.)

Does this research involve use of human subjects? ___ Yes ___ No

*Note that a response of "yes" will prompt notification of the Chairperson of the Institutional Review Board for the Protection of Human Subjects in Research about the information contained in this form and any supporting materials.

I am disclosing the following significant financial interest(s) related to my research (check all that apply) and attaching a written description and supporting documentation that identifies the business enterprise or entity involved, the amount of the interest, and the nature of the relationship.

___ Salary or other payment for services (e.g., consulting fees or honoraria).

___ Direct equity interests (e.g., stocks, stock options, or other ownership interests).

___ Intellectual property rights (e.g., patents, copyrights, and royalties from such rights).

___ Other significant financial interest held by me and/or my immediate family that possibly could affect or be perceived to affect the results of the research activities funded or proposed for funding.

Further, I agree:

- To update this disclosure during the period of the award as new reportable significant financial interests are obtained.
- To comply with any conditions or restrictions imposed by the University to manage, reduce, or eliminate actual or potential conflicts of interest or forfeit the award.
- If necessary, to have a fully executed conflict management plan in place prior to expenditure of any sponsored project funds.

The above/attached provides an accurate and current statement of all financial interests held by me and my immediate family that would reasonably appear to be affected by the proposed research.

Signed: _____ **Date** _____

Submit this form, any supporting documentation, and a draft plan for resolution of any conflict of interest in a sealed envelope marked confidential to the Vice President for Research, Room 107, Thompson Hall.

UNH POLICY ON FINANCIAL CONFLICT OF INTEREST IN RESEARCH SUMMARY and FINANCIAL DISCLOSURE STATEMENT PROCEDURES

What is required?

Federal regulations require institutions to have policies and procedures in place ensuring that investigators disclose any significant financial interest that may present an actual or potential conflict of interest in relationship to externally sponsored projects. Such disclosures must be made **prior to the submission of a proposal** for funding, and institutions must develop specific mechanisms by which conflicts of interest will be satisfactorily managed, reduced, or eliminated prior to the expenditure of any funds on an award. (Note that if a new reportable significant financial interest is obtained during the period of the award, an additional disclosure must be filed.)

Who is covered?

The principal investigator for each sponsored project must ensure that a Financial Disclosure Statement is submitted by all UNH employees who are responsible for the design, conduct, or reporting of research activities funded or proposed for funding by an external sponsor. This includes all investigators, co-investigators, and other individuals who have **independent responsibility for accomplishing project objectives**. The policy is not intended to apply to individuals who provide primarily technical support or who are purely advisory, with no direct access to the data (e.g., control over its collection or analysis), unless they are in a position to influence the study's results or have privileged information as to the outcome. This policy also applies to the employee's immediate family, i.e., his/her spouse/domestic partner and dependent children.

What must be disclosed?

Each employee must disclose all **significant financial interests**: **1)** that would reasonably appear to be affected by the research funded or proposed for funding by an external sponsor; or **2)** in entities (business enterprises) whose financial interests would reasonably appear to be affected by such activities.

What is covered?

"Significant financial interest" means anything of monetary value, including, but not limited to, salary or other payments for services (e.g., consulting fees or honoraria); direct equity interests (e.g., stocks, stock options, or other ownership interests); and intellectual property rights owned by the investigator and his/her immediate family (e.g., patents, copyrights and royalties from such rights).

The term **does not include**:

- 1) Salary, royalties, or other remuneration from UNH;
- 2) Income from seminars, lectures, teaching engagements sponsored by public/nonprofit entities;
- 3) Income from service on advisory committees or review panels for public or non-profit entities;
- 4) An equity interest that when aggregated for the employee/immediate family meets both of the following tests:
 - a) Does not exceed \$10,000 in value as determined through reference to public prices or other reasonable measures of fair market value; and
 - b) Does not constitute more than a five percent ownership interest in any single entity;
- 5) Salary, royalties, or other payments from sources external to UNH that when aggregated for the employee and his/her immediate family over the next twelve months are not expected to exceed \$10,000.

Disclosure Procedures:

- 1) All investigators must disclose their significant financial interests using this form and attaching any supporting documentation. The investigator must draft a conflict resolution plan. This form, documentation, and draft plan must be submitted in a sealed envelope marked confidential to the Vice President for Research, Room 107, Thompson Hall.
- 2) The complete disclosure packet must be submitted to the VPR **before the proposal is submitted** to the sponsoring agency.
- 3) The Disclosure Review Committee will review all disclosures. Resolution of any conflict of interest must be finalized before expenditure of any award funds.