UNH POLICY ON CONFLICT OF INTEREST IN RESEARCH
FINANCIAL DISCLOSURE STATEMENT INSTRUCTIONS

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 research 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 study 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 do not exceed $10,000 for the 12 months preceding the disclosure.

Disclosure Procedures:
1) All investigators must disclose their significant financial interests using the UNH FCOIR disclosure form (found here: http://unh.edu/research/conflicts-interest-commitment) and attaching any supporting documentation. If the sponsor is a Public Health Service [PHS] agency or an organization that requires compliance with PHS regulations, investigators should use the UNH PHS FCOIR form (found here: http://unh.edu/research/conflicts-interest-commitment.) This form and any supporting documentation must be submitted in a sealed envelope marked confidential to the Senior Vice Provost for Research (SVPR), Room 107, Thompson Hall.
2) The disclosure form must be submitted to the SVPR before the proposal is submitted to the sponsor.
3) The Disclosure Review Committee will review all disclosures. Before the expenditure of any award funds a plan to manage any conflict of interest must be finalized and Web-based training https://rit.sr.unh.edu/training/rcr-training/conflict-of-interest.html must be completed by each researcher with a management plan.