

Occidental College
Disclosure of Financial Interests Related to Projects Sponsored by
PHS/NIH, NSF, or Other Agencies Adopting the Federal Requirements
Project Cover Sheet

Completion of this form is mandatory for all Investigators on proposals to the National Science Foundation (NSF), the Public Health Service (PHS), the National Institutes of Health (NIH) or other sponsors that have adopted the federal requirements for financial disclosure. Federal Regulations (42 CFR Part 50 and 45 CFR Part 94) require a complete disclosure of all reportable financial interests (1) prior to award receipt, (2) as those interests change, and (3) on an annual basis during the project award period. The information may be released to the sponsor, including federal agency representatives.

Principal Investigator: Name _____ Department: _____

Project Dates: _____ - _____ Proposal Title: _____

Sponsor:

- PHS/NIH
 NSF
 Subcontract of PHS/NIH or NSF funds from:

 Other _____

This submission is for (check one):

- New Proposal
 Annual Reporting/Non-Competing Continuation
 Competing Continuation (Renewal)
 New Investigator Added to Project
 Change in Financial Interest

Disclosures and Certification

A. Principal Investigator certifies that this form provides (1) a complete disclosure of all individuals with responsibility for the design, conduct, or reporting of activities associated with this project, and (2) a complete disclosure of PI's significant financial interests related to this project.

Do you, your spouse or dependent children have any significant financial interests related to the work to be conducted as part of the above-referenced project? (Reference definitions on the reverse side of this form.)

- No Yes, Description of Financial Interest is attached in a sealed envelope. (Please type or print information.)

 Print Name and Title of Principal Investigator

 Signature of Investigator

 Date

B. Occidental Investigators: Each Investigator's signature acknowledges responsibility to provide a complete disclosure of all reportable financial interests prior to award receipt, as those interests change, and on an annual basis during the project award period.

Do you, your spouse, or dependent children have any significant financial interests related to the work to be conducted as part of the above-referenced project?

1. No Yes, Financial Disclosure Form is attached in a sealed envelope. (Please type or print information)

 Print Name of Investigator

 Signature

 Date

2. No Yes, Financial Disclosure Form is attached in a sealed envelope. (Please type or print information.)

 Print Name of Investigator

 Signature

 Date

3. No Yes, Financial Disclosure Form is attached in a sealed envelope. (Please type or print information.)

 Print Name of Investigator

 Signature

 Date

(Attach additional sheets as required to identify and include financial disclosure forms for all project Investigators.)

C. Non-Occidental Investigators: Will Non-Occidental Investigators be responsible, with the PI or Co-PI, for the design, conduct or reporting of the activities associated with the project (e.g., subcontractors, consultants, others with significant responsibilities)?

- NO** **YES** If Yes, Occidental must be assured that the home institution has policies that comply with the funding agency's regulations. Such assurance should be provided along with the participant's letter of commitment to the project.

Instructions

For Public Health Services (including National Institutes of Health) and National Science Foundation:

1. The Principal Investigator (PI) and each Investigator must sign the Disclosure as early as possible after the PI is informed that federal funding is likely.
2. Investigators having a significant related financial interest must also complete the Financial Disclosure Form. Allow sufficient time for the Oversight Committee to complete a review prior to award acceptance.
3. Submission of this form is also required on an annual basis for non-competing continuation awards, when a new Investigator is added to the project, or when an Investigator's financial interests increase, whichever comes first.

Definitions

Who is an "Investigator"? An individual responsible for the design, conduct, or reporting of the results of work performed or to be performed under the sponsored project. "Investigator" includes the Principal Investigator, Co-Investigators, and any other individual (including personnel from other institutions) who has independent responsibility for accomplishing project objectives. It may include students, graduate and undergraduate, and other personnel who may be listed as authors on project results, even if they are not paid from the project.

What is a "Significant Financial Interest"? Anything of monetary value, including, but not limited to:

1. Income exceeding \$10,000 when aggregated for an Investigator and the Investigator's spouse and dependent children from a single Entity (Business, Public or Nonprofit) including salary, consultant payments, honoraria, royalty payments, dividend, loan, or any other payments or consideration with value., Income from a Public or Nonprofit Entity for seminars, lectures, teaching engagements, or service on advisory committees or review panels is exempt;
2. Equity in the form of stock, stock options, real estate, loan to, or any other investment or ownership interest exceeding \$10,000 (current market value) or a 5% ownership interest, for any one enterprise when aggregated for an Investigator and the Investigator's spouse and dependent children;
3. A management position such as board member, director, officer, partner or trustee held by the Investigator, the Investigator's spouse and/or dependent children; or
4. Intellectual property interest held by the Investigator, or Investigator's spouse or dependent children on a patent, patent application, or a copyright of software assigned or to be assigned to a party other than Occidental.

Financial Interest does **not** include (1) payments made by Occidental (salary, royalties, honoraria, expense reimbursement or any other remuneration) or (2) an investment by a mutual fund, pension fund or other investment fund over which the investigator or his/her immediate family member does not exercise management of fund investment.

What is a "Related Financial Interest"? The work to be performed under the sponsored project and results therefrom would reasonably appear to affect the financial interest of the Investigator or the financial interest of the Entity in which the Investigator has an interest. The following are financial interests "related" to a sponsored project:

1. The Investigator is conducting a project where the results could be relevant to the development, manufacturing, or improvement of the products or services of the entity in which the Investigator has a financial interest;
2. The Investigator has a financial interest in an entity which might manufacture or commercialize a drug, device, procedure or any other product used in the project or that will predictably result from the project;
3. The Investigator has consulting income in his/her professional field that exceeds \$10,000 from a single entity during the prior twelve months. The Oversight Committee (OC) will provide an assessment as to whether any of that entity's financial interests, or the Investigator's financial interests related to consulting for that entity, would reasonably appear to be affected by the federally-sponsored research;
4. The Investigator has a financial interest in an entity and the sponsored project proposes to subcontract a portion of the work, or lease property, or make referral of participants to, or make purchases from the entity; or
5. The Investigator has a financial interest in an entity that is part of a consortium or that will otherwise participate in the sponsored project.

Review Process

The Oversight Committee (OC) will review the disclosure information to ensure completeness and consistency with prior disclosures. Information provided in the Disclosures of those Investigators having a Related, Significant Financial Interest and additional appropriate documentation shall be forwarded to the campus OC. The OC will consider whether the financial interests of the Investigator or the Entity could be directly and significantly affected by the proposed sponsored project and whether the financial interest could affect the design, conduct, or reporting of the project. A direct impact occurs when the project results would be directly relevant to the development, manufacturing, or improvement of the products or services of the entity in which the employee has a financial interest, or when the entity is a proposed subcontractor or participant in the project. A significant impact on the financial interest is one that will materially affect the value of the organization, its earnings, or the sale of its products. The OC will review the information and make a recommendation to the Associate Dean of the Faculty for Research, who is the responsible institutional official.

Retention of Information: Three (3) years after termination of sponsored project or three (3) years after resolution of any action by the sponsor, whichever is later.
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