



Financial Conflict of Interest (FCOI) in Research & Educational Activities

Screening and Disclosure Form

NAME:

DEPARTMENTAL AFFILIATION:

What is the purpose of the FCOI Screening & Disclosure process? To provide a reasonable expectation that the design, conduct, and reporting of research and educational activities funded through external sponsoring agencies is free from bias resulting from financial conflicts of interest.

What am I required to do? Disclose to the designated institutional official(s) your **significant financial interests** (and those of your spouse/domestic partner and dependent children) that reasonably appear related to **your institutional responsibilities**.

What do we mean by “financial interest”? Anything of monetary value, whether or not the value is readily ascertainable.

What are the thresholds to determine if a financial interest is “significant”? A significant financial interest exists if the value of any remuneration received from an entity* in the 12 months preceding the disclosure, when aggregated, reaches the thresholds set forth in the Worcester State University FCOI policy. This screening and disclosure form will walk you through the applicable thresholds, and any exclusions to the reporting requirements.

What do we mean by “institutional responsibilities”? Your professional responsibilities on behalf of Worcester State University, which include: research, research consultation, teaching, professional practice, institutional committee memberships, and service on panels such as IRB, IACUC, or other monitoring boards.

Who must complete this form? Any project director or principal investigator and any other person, regardless of title or position, who is responsible for the design, conduct, or reporting of externally funded research and/or educational activities, which may include collaborators or consultants.

When must this form be completed? Prior to submission of a proposal for external funding for research or educational activities. Additionally, this form must be updated prior to expenditure of sponsored project funds, within 30 days of a new significant financial interests being acquired, and at least annually during the life of the award.

Who will have access to this form? This form will be available to designated institutional officials charged with monitoring the WSU FCOI process, including the FCOI Review Officer. The information contained in the form will be reported to external entities to the extent and in the manner required by applicable regulations and the terms of the WSU FCOI policy.

What if it is determined that my financial interests represent a potential Financial Conflict of Interest (FCOI) with my funded project? The WSU FCOI Review Officer will work with you to establish an acceptable plan for managing the FCOI, and will monitor its implementation throughout the life of the award.

Where can I read the full FCOI policy? You can find the complete policy, plus disclosure forms at www.worcester.edu/grants.

Prior to expenditure of external funds, the WSU FCOI Review Officer will review any specific disclosures provided to determine whether the significant financial interest (SFI) could potentially bias the research or educational activities proposed. Please provide any relevant information in the “description” areas that may help the Review Officer understand how this SFI might relate to the research. The Review Officer may request additional information from you if needed. It is the responsibility of the institution (not the individual) to determine whether a specific SFI relates to one’s research and poses a financial conflict of interest, and to develop an appropriate plan for managing such conflicts of interest.

1. *Interests in Publicly Traded Entities:* In the past 12 months, did the value of any remuneration received or financial interests held by you, your spouse/domestic partner, or dependent child reach an aggregated value of \$5,000 or more?

When answering, you must consider the aggregate of:

- a) Salary or other payment for services received (e.g., consulting fees, honoraria, or paid authorships) and
- b) Equity interests (e.g., stock, stock option, or other ownership interest, as determined by public prices or other reasonable measures of fair market value).

Financial Interests that are **EXCLUDED** from this policy and which need not be disclosed:

Salary, royalties, remuneration paid by Worcester State University (as your current employer).

Income from seminars, lectures, or teaching engagements, sponsored by:

- A Federal, State, or Local government agency
- An Institution of Higher Education
- Academic Teaching Hospital
- A Medical Center
- A Research Institute that is affiliated with an Institution of Higher Education

Income from service on advisory committees or review panels for:

- A Federal, State, or Local government agency
- An Institution of Higher Education
- Academic Teaching Hospital
- A Medical Center
- A Research Institute that is affiliated with an Institution of Higher Education

Income from investment vehicles or retirement accounts unless you directly control the investment decisions made in these vehicles.

Disclosure of Interests in Publicly Traded Entities:

Name of Entity:

Value of Financial Interest:

- \$0 - 4,999
 - \$5,000 - \$9,999
 - \$10,000 - \$19,999
 - \$20,000 - \$39,999
 - \$40,000 - \$59,999
 - \$60,000 - \$79,999
 - \$80,000 - \$100,000
 - Over \$100,000 (document in increments of \$50K)
- \$ _____

Value cannot be readily determined

Description:

No, proceed to directly #2 below

Yes, provide disclosure before proceeding

2. *Interests in Non-publicly Traded Entities:* In the past 12 months, did you, your spouse/domestic partner, or dependent child:

- a) Receive remuneration from a non-publicly traded entity that, when aggregated, exceeded \$5,000, and/or
- b) Hold direct equity interests (of any dollar value) in a non-publicly traded entity (e.g., stocks, stock options, or other ownership interests)?

Financial Interests that are **EXCLUDED** from this policy and which need not be disclosed:

Salary, royalties, remuneration paid by Worcester State University (as your current employer).

Income from seminars, lectures, or teaching engagements, sponsored by:

- A Federal, State, or Local government agency
- An Institution of Higher Education
- Academic Teaching Hospital
- A Medical Center
- A Research Institute that is affiliated with an Institution of Higher Education

Income from service on advisory committees or review panels for:

- A Federal, State, or Local government agency
- An Institution of Higher Education
- Academic Teaching Hospital
- A Medical Center

Disclosure of Interests in Non-publicly Traded Entities:

Name of Entity:

Value of Financial Interest:

\$0 - 4,999

\$5,000 - \$9,999

\$10,000 - \$19,999

\$20,000 - \$39,999

\$40,000 - \$59,999

\$60,000 - \$79,999

\$80,000 - \$100,000

Over \$100,000 (document in increments of \$50K)

\$ _____

Value cannot be readily determined

Description:

- A Research Institute that is affiliated with an Institution of Higher Education

Income from investment vehicles or retirement accounts unless you directly control the investment decisions made in these vehicles.

No to both a) and b), proceed to directly #3 below

Yes to either a) or b) (or both), provide disclosure before proceeding

3. *Intellectual Property Rights & Interests:* In the past 12 months, have you, your spouse/domestic partner, or dependent child received/held licensed intellectual property rights (e.g., patents, copyrights), royalties from such rights, or agreements to share in royalties related to licensed intellectual property rights that reached a value of \$5,000 or greater?

Disclosure of Intellectual Property Rights & Interests:

Name of Entity:

Value of Financial Interest:

\$0 - 4,999

\$5,000 - \$9,999

\$10,000 - \$19,999

Financial Interests that are **EXCLUDED** from this category and which need not be disclosed:

- You do not need to disclose those intellectual property rights that you have assigned to Worcester State University or in instances where an agreement exists to share royalties to such property rights between Worcester State University and yourself, so long as you are an employee of Worcester State University.
- Unlicensed intellectual property that does not generate income is excluded. Nonetheless, Investigators are advised that such interests have the potential to become significant and generate income, at which point they would become subject to disclosure.

No, proceed to directly #4 below

Yes, provide disclosure before proceeding

- \$20,000 - \$39,999
- \$40,000 - \$59,999
- \$60,000 - \$79,999
- \$80,000 - \$100,000
- Over \$100,000 (document in increments of \$50K)

\$ _____

Value cannot be readily determined

Description:

4. In the past 12 months, have you, your spouse/partner, or dependent child engaged in **travel** that was reimbursed or sponsored (e.g., paid on your behalf) by an entity that does not appear on the excluded list below.

Travel that is **EXCLUDED** from this category and which need not be disclosed:

Travel reimbursed or sponsored by

- A Federal, State, or Local government agency
- An Institution of Higher Education
- Academic Teaching Hospital
- A Medical Center
- A Research Institute that is affiliated with an Institution of Higher Education

No, proceed to directly #5

Disclosure of Reimbursed or Sponsored Travel:

For each Trip, provide:

Purpose of the Trip:

Sponsor/Organizer:

Destination:

Duration:

*Note: You may be required by the FCOI Review Officer to provide information on the dollar value of the travel, if necessary to determine whether an FCOI exists.

<p>___ Yes, provide disclosure before proceeding <input type="checkbox"/></p>	
<p>5. Other significant financial interest(s) over \$5,000 held by me, my spouse/partner or dependent child in the past 12 months that possibly could affect or be perceived to affect the results of the research and/or educational activities funded or proposed for funding.</p>	<p>For each "Other" significant financial interest (SFI), provide:</p> <p>Entity:</p> <p>Approximate Dollar Value:</p> <p><i>Description:</i></p>

By signing this document I indicate my understanding of the Worcester State University Financial Conflict of Interest (FCOI) in Research Policy, certify that the above/attached information provides an accurate and current statement of all of my significant financial interests relating to my institutional responsibilities (and the significant financial interests of my spouse/partner, and dependent children), and **I agree to:**

- Complete the required WSU FCOI training prior to expenditure of funds, and maintain currency in such training as required by the WSU FCOI policy (e.g., every four years or when other circumstances dictate).
- Comply with any conditions or restrictions imposed by the University to manage, reduce, or eliminate actual or potential financial conflicts of interest or forfeit the award, and have a fully executed financial conflict of interest management plan in place prior to expenditure of any sponsored project funds (if determined to be necessary by designated officials of Worcester State University).
- Update this disclosure during the period of the award **within 30 days** of any new reportable significant financial interests being obtained.
- Update this disclosure at least annually during the life of any sponsored agreement.

Signed: _____

Date of Initial Disclosure: _____

Subsequent Certifications:

As of the date indicated, I reviewed this initial disclosure information and certify that it remains complete and accurate, and I have no additional SFIs to disclose.

(If you have new SFI information to disclose, or information to remove because it is no longer relevant, please complete a fresh form).

Signed: _____

Date: _____

Signed: _____

Date: _____

Signed: _____

Date: _____

Signed: _____

Date: _____