

FINANCIAL DISCLOSURE REQUIREMENTS FOR SUBRECIPIENT INVESTIGATORS OF PUBLIC HEALTH SERVICE FUNDED PROJECTS

Michigan Technological University - Office of Compliance, Integrity, and Safety

Disclosure Requirement: You have been identified as a subrecipient investigator subject to Michigan Technological University's Conflicts of Interest policy. Under the Public Health Service's (PHS) Financial Conflict of Interest (FCOI) regulation (42 CFR Part 50 Subpart F), you must disclose your significant financial interests (SFI) on the attached Form A, to include those of your spouse and dependent children, that are directly related to the research you are conducting in collaboration with Michigan Technological University. Disclosures must be made:

- No later than at the time of application for PHS funded research;
- Within 30 days of discovering or acquiring (e.g., through purchase, marriage, or inheritance) a new SFI. This includes any disclosures that arise between the time the proposal is submitted and an award is made; The obligation to update your disclosure within 30 days of acquiring the new SFI also applies to any new reimbursed or sponsored travel (see question 4 on the form); and
- At least annually, in accordance with Michigan Technological University policy, during the period of award.

Training Requirement: You also are required to read Michigan Tech's [Policy and Procedures](#) and complete the NIH on-line training module before engaging in research related to this PHS-funded award and once every four years thereafter. The on-line training will take about 20 minutes to complete, and you will be able to print the completion certificate at the end of the module.

To take the training click here: <http://www.grants.nih.gov/grants/policy/coi/tutorial2011/fcoi.htm>

You are required to complete Form A (attached).

Please send this form and a copy of your training completion certificate to FCOI@mtu.edu or Michigan Technological University, Office of Compliance, Integrity, and Safety, 1400 Townsend Drive, 302 Lakeshore Center, Houghton, MI 49931.

Definitions:

“Remuneration” includes any of the following that may have been received in the past 12 months, where the remuneration reasonably appears to be related to this research, sponsors of this research, or your institutional responsibilities: Salary, Consulting fees, Honoraria, Paid authorship, Rent, Deferred income, Loans (other than secured commercial loans), Wages, Retainers, Any other economic benefit received for services rendered or to be rendered.

“Equity interest” includes any of the following types of ownership interest that you (or your spouse/partner or dependent children) hold at the time of this disclosure, where the interest reasonably appears to be related to this research, sponsors of this research, or your institutional responsibilities: Stocks, Stock options, Warrants, Equity/membership, Profit-sharing, Convertible securities, Any other ownership interest

“Intellectual property right or interest” includes any direct or indirect interest in a patent, trademark, copyright, trade secret, or other intellectual property right.

“Intellectual property rights or interests” do not include intellectual property rights assigned to the Institution that is applying for, or that receives, PHS research funding for this project or agreements to share in royalties related to such rights.

“Reimbursed or sponsored travel” does not include travel that is reimbursed or sponsored by a Federal, state, or local government agency, an Institution of higher education as defined at 20 U.S.C. 1001(a), an academic teaching hospital, a medical center, or a research institute that is affiliated with an Institution of higher education.

FORM A - DISCLOSURE FORM FOR SUBRECIPIENT INVESTIGATORS

Michigan Technological University PHS supported project title: _____

Name of Subrecipient Entity: _____

Name of Subrecipient Researcher completing this form: _____

1. Do you (or your spouse or dependent children) have an equity interest in any publicly traded entity, or have you (or your spouse or dependent children) received remuneration from any publicly traded entity in the past 12 months, where the combined value of the equity interest and remuneration equals or exceed \$5,000?

No Yes (if yes, provide name of entity): _____

If the value of the equity interest cannot be readily determined through reference to public prices or other reasonable measures of fair market value, explain why.

2. Have you (or your spouse or dependent children) received remuneration in the past 12 months from a non-publicly traded entity that in aggregate equals or exceeds \$5,000, or do you (or your spouse or dependent children) have an equity interest in a non-publicly traded entity?

a. Remuneration that when aggregated exceed \$5,000.

No Yes (if yes, provide name of entity): _____

If the value of the remuneration cannot be readily determined through reference to public prices or other reasonable measures of fair market value, explain why.

b. Any equity interest.

No Yes (if yes, provide name of entity): _____

If the value of the equity interest cannot be readily determined through reference to public prices or other reasonable measures of fair market value, explain why.

3. Have you (or your spouse or dependent children) received income in excess of \$5,000 during the past twelve months that is related to intellectual property rights and interests (e.g. patents, copyrights)?

No Yes (if yes, provide name of entity): _____

4. Has any organization sponsored or reimbursed you for any travel you have taken that is related to this research, sponsors of this research, or your institutional responsibilities?

No Yes

If yes, provide the name of sponsor/organizer, purpose, destination, and duration of trip:

5. Additional details about reported financial interests:

I certify, to the best of my knowledge, that the information reported herein is complete and accurate.

Signature of Investigator

Date