

Missouri State University Investigator Significant Financial Interest Disclosure Policy

(Applicable to all Sponsored Project Proposals)

Each Investigator shall disclose all significant financial interests:

- (i) that would reasonably appear to be directly and significantly affected by the research or educational activities funded, or proposed for funding, by an external sponsor; or
- (ii) in entities whose financial interests would reasonably appear to be directly and significantly affected by such activities.

What is required?

Federal regulations require institutions to have policies and procedures in place that ensure 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 award or acceptance of an award.

*If a new reportable significant conflict of interest arises at any time during the period after the submission of the proposal through the period of the award, the filing of a disclosure is also required.

Who is Covered?

“Investigator” means the principal investigator/project director, co-principal investigators, and any other person at the University who is responsible for the design, conduct, or reporting of research or educational activities funded, or proposed for funding, by an external sponsor. In this context, the term “investigator” includes the investigator’s spouse and dependent children.

What is Covered?

“Significant financial interests” means anything of monetary value, including, but not limited to, salary or other payments for service (e.g., consulting fees or honoraria); equity interests (e.g., stocks, stock options or other ownership interests); and intellectual property rights (e.g., patents, copyrights and royalties from such rights). The term does not include:

- (1) Salary, royalties, or other remuneration from the Institution;
- (2) Income from seminars, lectures, or teaching engagements sponsored by public or nonprofit entities;
- (3) Income from service on advisory committees or review panels for public or nonprofit entities; or
- (4) Financial interests in business enterprises or entities if the value of such interests do not exceed \$5,000 (or \$5,000 per annum if such interests represent salary, fees or other continuing payments) or represent more than 5% ownership interest for any one enterprise or entity when aggregated for the investigator and the investigator's spouse and dependent children.

Disclosure Procedures:

- (1) Each investigator will be provided a copy of Missouri State University Investigator Significant Financial Interest Disclosure Policy, to determine if there are any financial

interests to be disclosed. Each Investigator will certify whether or not disclosure is required by signing a statement in the University's Sponsored Project Internal Approval Form. If disclosure is required, those disclosures will be made to the Director of the Office of Sponsored Research and Programs and completing the Significant Financial Interest Disclosure form and including with the Internal Approval Form.

- (2) All Investigators must disclose their significant financial interests utilizing this form and attaching all required supporting documentation. The completed form and packet must be submitted with the proposal and Missouri State's Internal Approval Form to the Office of Sponsored Research and Programs. Supporting documentation should be submitted in a sealed envelope marked "confidential"
- (3) In accordance with Federal regulations, a complete disclosure must be made by Investigator(s) participating in the funded research prior to submission of proposal to the external sponsor.
- (4) Resolutions to conflicts of interest will be incorporated in a Memorandum of Understanding (MOU) that is executed between the Investigator(s) and the Dean/Director prior to issuance of the Notice of Grant Award.
- (5) All Investigators will update during the pendency of the award, either on an annual basis or as new reportable Significant Financial Interests are obtained.
- (6) The College Dean and/or the Director of the Office of Sponsored Research and Programs will review financial disclosures and determine whether the Significant Financial Interests could affect the design, conduct or reporting of the research, determine what conditions or restrictions, if any, should be imposed to manage such interests. Conditions or restrictions, may include (1) public disclosure of such interests; (2) monitoring of research by independent reviewers; (3) modification of the research plan; (4) disqualification from participation in all or a portion of the funded research; (5) divestiture of significant financial interests; or (6) severance of relationships that create actual potential conflicts.
- (7) The Office of Sponsored Research and Programs is responsible to maintain records identifiable to each award of financial disclosures and actions taken for at least three years beyond the termination or completion of the award.
- (8) The Director of the Office of Sponsored Research and Programs, the Vice President for Research and Economic Development, the Dean of the Graduate College, or the appropriate college Dean are authorized persons to certify in an application for funding that the requirements for establishment, enforcement, disclosure, management, communication, and notification regarding significant financial interests have been satisfied.
- (9) Failure of any University employee to comply with the requirements of the University's Investigator Significant Financial Interest Disclosure Policy may result in appropriate action including disqualification or removal from the grant project, and/or personnel action according to the University's employee disciplinary procedures.

Significant Financial Interest Disclosure
(File only if a significant Financial Interest exists)

Faculty/Staff Name: _____

Department/Unit: _____

College/Unit: _____

Proposal Submitted to: _____

I have received and reviewed Missouri State University Investigator Significant Financial Interest Disclosure Policy. I am disclosing the following "Significant Financial Interests" as defined in the Policy, and attaching supporting documentation (in an envelope marked "confidential") that identifies any business enterprise or entity involved and the nature and amount of the interest. I understand that I do not have to disclose any exceptions to "significant Financial Interests," as defined in the Policy.

I am disclosing:

- Salary or other payment for services (e.g., consulting fees or honoraria).
- 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 interests of the Investigator that possibly could affect or be perceived to affect the results of the research or educational activities funded or proposed for funding.

Further I agree:

- To update this disclosure during the period of the award, either on an annual basis, or as new reportable significant financial interests are obtained.
- To cooperate in the development of a Memorandum of Understanding (MOU) that constitutes a conflict of interest "resolution plan."
- 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.

Signed: _____
(signed) (date)

Endorsements:

I have reviewed the significant financial interests disclosure and have taken action as necessary so that significant financial interests are managed, reduced or eliminated, and therefore recommend that the proposal be submitted to the agency at this time.

Department/Unit Head: _____
(signed) (date)

College Dean/Director: _____
(signed) (date)

Effective Date: October 1, 1995