



**DISCLOSURE FORM TO IMPLEMENT THE UNIVERSITY'S
CONFLICT OF INTEREST POLICY FOR EXTERNALLY-FUNDED RESEARCH**

Funding Organization: _____

Principal Investigator's Name: _____

Title of Proposal: _____

INTRODUCTION

Pursuant to the University's [Conflict of Interest Policy for Externally-Funded Research](#) ("Conflicts Policy") each **Principal Investigator** proposing to engage in externally-funded research must, on or before the date of application for such research funding, fill out this Disclosure Form ("Form") and submit it to the University's **Conflicts Coordinator**. The Form must be completed regardless of the funding source (whether public or private), and must be updated annually and within 30 days if a new reportable **Significant Financial Interest** is obtained. Questions regarding this Form or regarding the Conflicts Policy should be directed to the **Conflicts Coordinator** in the Office of Sponsored Programs and Research Services (OSP) at (202) 319-5218 or CUA-OSP@cua.edu.

DEFINITIONS

Principal Investigator means an individual, regardless of title, who is responsible for the design, conduct, reporting, or fiscal management of research funded or proposed for funding by an external entity. Principal Investigators may include, for example, consultants, subgrantees, subcontractors, or subrecipients not employed directly by the University.

Significant Financial Interest means:

1. A Financial Interest consisting of one or more of the following interests of the Principal Investigator (or those of the Principal Investigator's spouse and dependent children) that reasonably appears to be related to the Principal Investigator's University Responsibilities:
 - a. With regard to any publicly traded entity, a Significant Financial Interest exists if the value of any remuneration received from the entity in the twelve months preceding the disclosure and the value of any equity interest in the entity as of the date of disclosure, when aggregated, exceeds \$5,000. For purposes of this definition, remuneration includes salary and any payment for services not otherwise identified as salary (e.g., consulting fees, honoraria, paid authorship); equity interest includes any stock, stock option, or other ownership interest, as determined through reference to public prices or other reasonable measures of fair market value;
 - b. With regard to any non-publicly traded entity, a Significant Financial Interest exists if the value of any remuneration received from the entity in the twelve months preceding the disclosure, when aggregated, exceeds \$5,000, or when the Principal Investigator (or the Principal Investigator's spouse or dependent children) holds **any** equity interest (e.g., stock, stock option, or other ownership interest); or
 - c. Intellectual property rights and interests (e.g., patents, copyrights), upon receipt of income related to such rights and interests.
2. The term Significant Financial Interest does not include the following types of Financial Interests: salary, royalties, or other remuneration paid by the University to the Principal Investigator if the Principal Investigator is currently employed or otherwise appointed by the University, including intellectual property rights assigned to the University and agreements to share in royalties related to such rights; income from investment vehicles, such as mutual funds and retirement accounts, as long as the Principal Investigator does not directly control the investment decisions made in these vehicles; income from seminars, lectures, or teaching engagements sponsored by a Federal, state, or local government agency, an Institution of Higher Education (IHE) 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 IHE; or income from service on advisory committees or review panels for a Federal, state, or local government agency, an IHE 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 IHE.



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DISCLOSURE

Please list any and all **Significant Financial Interests** (as defined above) that you, your spouse and/or your dependent children possess. If none, please state "none."

CERTIFICATION

I certify that I have read and understand the University's Conflicts Policy and that I have completed this Disclosure Form truthfully, fully and to the best of my ability, and have completed the training requirement. I further certify that I will update this Form upon any relevant change in my circumstances.

Principal Investigator's Signature

Date

*(This section to be filled out by **Conflicts Coordinator**)*

Disclosure represents a Financial Conflict of Interest: YES NO

I have reviewed this Disclosure Form and imposed the following restrictions (Management Plan), if any, in order to manage, reduce or eliminate the Financial Conflict of Interest:

Conflict Coordinator's Signature

Date