

## Instructions for Investigator Significant Financial Interest Disclosure for Externally Funded Grants and Contracts

### What is Required?

Federal regulations require institutions to have policies and procedures in place to ensure that Investigators disclose all *Significant Financial Interests* that may present actual or potential conflicts of interest in relationship to NSF or PHS sponsored projects. At Whitworth College, this policy is applied to all externally funded grants and contracts. Disclosures must be made prior to the submission of proposals for funding. Institutions must develop specific mechanisms by which conflicts of interest will be satisfactorily managed, reduced, or eliminated prior to the expenditure of funds on any subsequent award. If a new reportable *Significant Financial Interest* develops at any time following the submission of a proposal but prior to the end of the project period and any subsequent award, the filing of a new disclosure is also required.

### What *Significant Financial Interests* must be Reported?

Each Investigator must disclose all *Significant Financial Interests*:

- that would reasonably appear to be affected by the research, education, or service activities funded or proposed for funding, by an external sponsor; or
- in entities whose interests would reasonably appear to be affected by such activity.

### Step 1 -How is Disclosure Made?

The Principal Investigator must provide a copy of the Disclosure Form to each individual who meets the definition of an Investigator (See #1 below);

### Step 2 - Determining if you have a *Significant Financial Interest* to Disclose.

Check all the statements that apply to you:

1. \_\_\_ You are an “*Investigator*” on this Project

*The term “Investigator” includes the Principal Investigator, Program, Director, Co-Investigator, and any other person who is responsible for the design, conduct, or reporting of research, educational, or service activities funded, or proposed for funding.*

2. \_\_\_ You have an equity interest (stocks, stock options or other ownership interests) over \$10,000 or constituting more than 5% ownership, regardless of the value, that could be viewed as presenting an actual or potential conflict of interest.

*Example: You are a Whitworth professor, but you also own the company that you are in partnership with to develop a new innovative product from which the company will make money in the future.*

3. \_\_\_ Either your spouse or dependent children have an equity interest in excess of \$10,000 in value as determined through reference to public prices and other reasonable measures of fair market value or an ownership interest exceeding 5% in any single entity, regardless of value, and that entity’s financial interest would reasonably appear to be affected by the specified activities for which funding is sought.

*Example: Your spouse owns a company that produces equipment that you will buy with the grant funds.*

4. \_\_\_ Either you, your spouse, or dependent children have intellectual property rights (e.g. patents, copyrights and royalties from such rights).

*Example: Through the activities of this project, you will increase royalties received due to a patent which you hold.*

5. \_\_\_ You, your spouse, or dependent child will receive salary or other payments for services in excess of \$10,000 over the next twelve months. (Individual, not aggregate)

*This includes consulting fees or honoraria. It does not include salary, royalties or other remuneration from Whitworth College, income from seminars, lectures, or teaching engagements sponsored by public or nonprofit entities, income from service on advisory committees or review panels for public or nonprofit entities.*

### Step 3 – Signing Section A or B and Submitting the Form

Follow the instructions below to determine which section to sign and how to file the form.

- If you did not check any of the above items, you do not need to fill out this form.
- If you checked #1 only, you do not have a reportable “*Significant Financial Interest*” and need to sign SECTION A only and submit the form to the Office of the Academic Grant Writer.
- If you checked #1 and any other number, you have a “*Significant Financial Interest*” and need to sign SECTION B.
- If you signed SECTION B:
  1. Place documentation detailing the *Significant Financial Interest* in an envelope marked CONFIDENTIAL and submit with the Disclosure Form for endorsement by the Investigator’s Chair.
  2. The Principal Investigator must then submit the completed Disclosure Forms and attachments from all Investigators to the Office of the Academic Grant Writer.
  3. The confidential information will remain sealed until such time as a notification of award from the funding agency is received. Determinations regarding the existence of any conflicts of interest will be made by the college’s Conflict of Interest Review Committee for funded projects using the confidential information. If conflicts are identified they must be resolved through a Resolution Plan between each individual Investigator and the College prior to the expenditure of any awarded funds. Confidential information submitted for projects that are not funded will be returned to the Investigator unopened, or destroyed as requested by the Investigator.

### For Additional Information or a Copy of the College Policy and Procedures for Significant Financial Interest Disclosure:

Contact the Office of the Academic Grant Writer (ext. 3701).