Conflict of Interest Form

Disclosure of Significant Financial Interests and Obligations

As part of its commitment to promoting objectivity in research and in compliance with federal regulations on conflict of interest, the University at Albany has adopted a Policy on Financial Conflict of Interest. This Policy requires that the investigators submit an annual disclosure form to ensure that the design, conduct and reporting of sponsored program activity will not be biased by the significant financial interests or obligations of any investigator. Investigators required to file include those in the roles of Principal Investigator, Co-Principal Investigator, project director, and any individual who is in a significant decision-making role or who has (or, if funded, will have) signature authority for a Research Foundation account. To comply with this Policy, each investigator must submit an annual Disclosure of Significant Financial Interests and Obligations on or before October 1, but no later than:

- submission of an application to an external sponsor, or
- acceptance of any award where there was no prior disclosure submitted for that work, or
- submission of a human or animal study protocol for review by an Institutional Review Board (IRB), the Institutional Animal Care and Use Committee (IACUC), or the Institutional Biosafety Committee.

In addition, a revised Disclosure must be filed whenever an investigator’s significant financial interests and obligations change materially.

The Disclosure of Significant Financial Interests and Obligations is a two-part form. All investigators must complete Part I. If an investigator’s answers to Part I indicate that there may be a real or apparent conflict of interest, the investigator will also need to file Part II.

The completed Disclosure of Significant Financial Interests and Obligations should be placed in a sealed envelope, marked “Confidential,” and forwarded to the Associate Vice President for Research, Management Services Center, Room 312. The Office for Sponsored Programs will not submit your sponsored programs application until your annual Disclosure form has been submitted. Compliance with this requirement is also a prerequisite to the acceptance by the Research Foundation of any research grant or contract.

The submission of this annual Disclosure satisfies the requirements of the Department of Health and Human Services (PHS) and the National Science Foundation (NSF). These agencies require that, by the time an application is submitted, each investigator planning to participate in PHS or NSF-funded research has disclosed his/her known significant financial interests (and those of his/her spouse and dependent children) (42 CFR Part 50 Subpart F and 45 CFR Part 94 and Section 510 of the NSF Grant Policy Manual).

Questions concerning this Policy or the annual Disclosure should be addressed to Robert O. Webster, Associate Vice President for Research (rwebster@uamail.albany.edu).

Adopted: April 19, 2006
Provider: Office for Sponsored Programs
Contact: Robert Webster, Associate Vice President for Research
Location: MSC 312
Last updated: January 7, 2008
Conflict of Interest Form
Disclosure of Significant Financial Interests and Obligations
Part I

All University at Albany investigators seeking external sponsored funding to conduct scholarly activities are required to complete and file a signed Disclosure of Significant Financial Interests and Obligations each year. Each investigator must complete this form before a proposal can be endorsed for submission.

Specific Instructions: Place a check in the appropriate column for each question. Once every question is answered, the investigator must certify the information by signing the bottom of the form.

Investigator Name: ____________________________

Department/School: ____________________________

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<tr>
<th>Questions</th>
<th>Yes</th>
<th>No</th>
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<td>Do you, your spouse or dependent child(ren) hold a position of management, such as board member, director, officer, partner, trustee, employee or consultant with a sponsor, a vendor or (sub) contractor related to the sponsored program activity?</td>
<td>☐</td>
<td>☐</td>
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<tr>
<td>Do you, your spouse or dependent child(ren) have Significant Financial Interest in a Sponsor, a vendor or (sub) contractor related to your sponsored program activity? “Significant Financial Interest” includes stock, stock options, and/or any other ownership interest in a single entity valued at more than $10,000 or 5% ownership.</td>
<td>☐</td>
<td>☐</td>
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<tr>
<td>Is it reasonable to anticipate that your financial interest could be directly and significantly affected by the design, conduct, or reporting of your sponsored program activity?</td>
<td>☐</td>
<td>☐</td>
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If you answered “No” to ALL of the questions above, your Disclosure is complete; you do not have to submit Part II. Please sign and date the certification below and forward to the Associate Vice President for Research.

If you answered “Yes” to ANY question above, please complete a separate Part II for every outside organization with which you have the relationship(s) indicated above.

Investigator Certification:

- I have read and understood the Policy on Financial Conflict of Interest.
- I agree to file a new or updated Disclosure of Significant Financial Interests and Obligations form if the answer to any of the above questions changes.
- I certify that the answers to the declaration are accurate and truthful to the best of my knowledge.

Signature: ____________________________ Date: ____________________________
Conflict of Interest Form
Disclosure of Significant Financial Interests and Obligations
Part II

Complete Part II only if you answered, "YES" to at least one of the questions in Part I.

Attach one Part II form for each organization with which you have the relationship(s) indicated in Part I.

Investigator Name: ________________________________________________________________

Number of Part II forms submitted: _____, of which, this is number: _____

1. Name of organization: ___________________________________________________________

2. Financial relationship(s) with the organization (check all that apply):
   - Consultant
   - Employee
   - Equity Interest
   - Recipient of Honoraria
   - Recipient of Royalties
   - Other (Describe): ___________________________________________________________

3. The financial relationship is between the organization and (check all that apply):
   - Self
   - Spouse
   - Dependent Child(ren)

4. Have you received in the last twelve (12) months, or do you expect to receive in the next twelve (12) months, payments for salary, director's fees, consulting, honoraria, royalties, or any other payments that when aggregated with payments from this organization to your spouse and/or dependent child(ren) will exceed $10,000?
   Y [ ] N [ ]

5. Have you had in the last twelve (12) months or do you anticipate having in the next twelve (12) months, stock, stock options, or other equity interests in the organization which, when aggregated with those of your spouse and dependent child(ren) in this organization, have a fair market value exceeding $10,000 or represent an ownership interest of 5% or more?    Y [ ] N [ ]

6. What relationship, if any, is there between the business or activities of the organization and your current or planned areas of research?