

Instructions for Disclosing Significant Financial Interests (SFIs)

Related to U.S. Public Health Service (PHS) Funded Research

What research funding sources require disclosure?

The disclosure requirement applies to all U.S. Public Health Service (including NIH, AHRQ, ATSDR, CDC, FDA, HRSA, IHS, and SAMHSA) sponsored research. This includes any application for, or the receipt of, such funding.

Which investigators must disclose Significant Financial Interests (SFIs)?

Anyone who is planning to participate in, or who is participating in, PHS-funded research must disclose SFIs. This includes (1) the principal investigator or project director; and (2) any other person, regardless of title or position, who is responsible for the design, conduct, or reporting of the research, or proposed for such PHS funding (which may include collaborators or consultants).

Whose SFIs must be disclosed?

Each investigator must disclose his/her own SFIs and the SFIs of the investigator ' s spouse and dependent children.

What if there is nothing to disclose?

If there are no SFIs to disclose, the investigator must so certify on the disclosure form. Please also indicate “ No SFIs to Disclose ” in the subject line of the e-mail message to which your disclosure form is attached.

Must the SFI be related only to the research in order to require disclosure?

An SFI must be disclosed if it reasonably appears to be related to the investigator ' s professional responsibilities on behalf of SU which fall within SU ' s institutional mission of research, education, or service (i.e. not just research). This includes activities such as research, research consultation, teaching, professional practice, institutional committee memberships, and service on panels such as the Institutional Review Board, Institutional Animal Care and Use Committee, or data and safety monitoring board or committee.

SFIs that must be disclosed include:

- Remuneration of any value during the 12 months prior to the disclosure from any entity (consulting or speaking fees, honoraria, salary or wages, paid authorship).
- Income during the 12 months prior to the disclosure from intellectual property rights unless paid under an agreement with UMB.

- Equity interest in any entity (stock, stock options, or other ownership interests).
- Any reimbursed or sponsored travel during the past 12 months that was paid on your behalf or reimbursed directly to you.

SFIs that are not required to be disclosed are:

- Salary, royalties, or other remuneration paid by SU to the investigator if currently employed or otherwise appointed by SU.
- Income from investment vehicles such as mutual funds and retirement accounts, if not directly controlled.
- Assets in a blind trust managed by an independent fiduciary.
- Income from seminars, lectures, or teaching engagements sponsored by qualifying U.S. institutions (foreign equivalents must be disclosed).
- Income from service on advisory committees or review panels of qualifying organizations.
- Travel reimbursed or sponsored by qualifying U.S. institutions (foreign equivalents must be disclosed).

When is disclosure of SFIs required?

- At or before the time of submission of an application for PHS-funded research.
- At least annually during the period of the PHS-funded research award, no later than sixty (60) days prior to the beginning of each fiscal year of such award.
- Within 30 days of discovering or acquiring a new SFI (i.e., by purchase, marriage or inheritance).

Notes:

Financial interests (including payments and sponsored travel) in professional and scientific societies or associations must be disclosed. Please include with your disclosure e-copies of any relevant documents, such as consulting agreements, shareholder agreements or licensing agreements. Submit disclosures confidentially to: tlherberger@salisbury.edu. Questions concerning your disclosure may be submitted by e-mail.