

# Indiana University Bloomington

## Financial Conflicts of Interest Disclosure Form



You must update your disclosed interests (1) annually, and (2) at any time during the year when new disclosable interests arise or new research projects or sponsored programs are undertaken that relate to existing financial interests. For the 2007-2008 annual disclosure process, the forms must be sent to your Unit Head by September 28, 2007, and will remain in effect until September 2008.

Name (please print or type): \_\_\_\_\_

Campus: \_\_\_\_\_

Primary Unit, Title, Rank: \_\_\_\_\_

Administrative Position(s): \_\_\_\_\_

Other departments, schools, and units in which you hold appointments (please indicate percentages): \_\_\_\_\_

If you select "Yes" for any of the following, please complete and submit a Disclosure Attachment with this form for each relevant outside financial interest. If you answer "No" to all questions you are finished with this document and can give it to your unit head. *For more instructions about which interests must be disclosed and an in-depth explanation of the financial conflicts of interest disclosure process, please see page 3 through 6.*

1

- Yes  
 No

During the next twelve months, do you, your spouse, registered domestic partner, or your dependent children expect to receive compensation – monetary or otherwise – from an external (non-IU) entity relating to any medical or clinical trial research in which you are engaged at IU and which involves the participation of human subjects?

2

- Yes  
 No

During the next twelve months, do you, your spouse, registered domestic partner, or your dependent children expect to receive aggregated compensation – monetary or otherwise – exceeding \$10,000 in value from an external (non-IU) entity operating in areas relating to your research or sponsored program activities at IU?

3

- Yes  
 No

Do you, your spouse, registered domestic partner, or your dependent children currently hold, or expect to hold at some point during the next twelve months an ownership interest in an entity operating in areas relating to your IU research or sponsored programs, and which when aggregated together for all of you represents either (i) an equity interest that exceeds \$10,000 in value OR (ii) more than five percent (5%) ownership of the entity?

I hereby affirm that the above information (and the information contained in the attached statements, if any) is true to the best of my knowledge, and that I will update promptly if my circumstances change.

Employee Signature: \_\_\_\_\_ Date: \_\_\_\_\_

Please submit your completed form to your Unit Head. The "Unit Head" is the head of the unit of your primary appointment -- your department chair, if you are in COAS; your school dean, for all other schools; or your director, if your primary appointment is in a center.

# Financial Conflicts of Interest Disclosure Form

## Disclosure Attachment



Complete this Disclosure Attachment to further describe a “yes” answer on your Financial Conflicts of Interest Form. Below please describe the entity, your relationship to the entity, and how the entity’s activities relate to your research. Please use additional sheets if needed.

This disclosure relates to Question(s) # \_\_\_\_\_ of the IU Financial Conflicts of Interest Form.

**Name of the entity from which you have received/will receive the disclosed compensation:**

\_\_\_\_\_

**Type of entity:**

- For profit (publicly-owned)
- For profit (privately-held)
- Non profit
- Governmental

**Briefly describe the outside interest:**

[i] The business of this entity? \_\_\_\_\_

\_\_\_\_\_

[ii] What is the nature of the work for which you, your spouse, registered domestic partner, or dependent children will receive compensation? \_\_\_\_\_

\_\_\_\_\_

[iii] How does the work you, your spouse, registered domestic partner, or dependent children perform relate to your University research or sponsored program? \_\_\_\_\_

\_\_\_\_\_

[iv] Is the disclosed interest royalties or licensing fees? Describe the intellectual property these payments are related to? \_\_\_\_\_

\_\_\_\_\_

[v] Your role(s) and the role(s) of your spouse, registered domestic partner, and dependent children with this entity (shareholder, director, officer, employee, independent contractor, etc.)? \_\_\_\_\_

\_\_\_\_\_

Is this entity or any of its employees using space, equipment or facilities at IU?  
*Do NOT include IU work done pursuant to sponsored research agreements.*

- Past 12 months
- Next 12 months

If selected either, please identify where and describe work: \_\_\_\_\_

\_\_\_\_\_

**Briefly describe your IU research and sponsored program work:**

- Is your research/sponsored program work funded by NIH or NSF?
- Does your research/sponsored program work involve human subjects?
- None of the above.

Name: \_\_\_\_\_ Date: \_\_\_\_\_

**Once all disclosures are complete, please forward to unit head.**

# Financial Conflicts of Interest Disclosure Form

## Unit Head



### INSTRUCTIONS FOR UNIT HEAD:

1. Please review the above disclosure and complete the "Unit Approvals" section below.
2. If you check "No Disclosable Interests" below, please retain the disclosure in your files, and report to the Office of Research Compliance that the form has been filed and completed (see Instruction # 5 below). After reporting that the form has been filed and completed, retain the form for three years.
3. If you check "Disclosed Interest; no potential for conflict identified" below, please indicate why the disclosed interests present no potential for conflict, keep a copy for your records, and forward the form to the Office of Research Compliance by October 15, 2007.
4. If you check "Disclosed Interest represents potential or actual conflict", please explain the conflict below, keep a copy for your records, and forward this form to Office of Research Compliance by October 15, 2007.
5. Please send to the Office of Research Compliance by October 15, 2007, a list of all persons in your unit who are required to complete a financial conflicts of interest disclosure, and indicate on the list
  - (i) Whether or not each person has completed a disclosure;
  - (ii) All persons who have completed a disclosure and have no disclosable interests (i.e. all persons for whose disclosures you concluded there are "No Disclosable Interests" below)
  - (iii) All persons who have disclosed a significant financial interest and whose forms are being reviewed by the Office of Research Compliance.

**Forms and information that must be forwarded to the Office of Research Compliance should be sent to:**

ATTN: COI Administrator  
Office of Research Compliance  
Indiana University  
Carmichael Center, Suite L03  
530 East Kirkwood Avenue  
Bloomington, Indiana 47408-4003  
*Or by email to: [coi@indiana.edu](mailto:coi@indiana.edu)*

### UNIT APPROVALS (Check one)

- No disclosable interests  
 Disclosed interests; no potential for conflict (please explain below)  
 Disclosed interest represents potential or actual conflict (please explain below)

PRINTED NAME AND TITLE OF UNIT HEAD OR DESIGNEE: \_\_\_\_\_

SIGNATURE \_\_\_\_\_ DATE \_\_\_\_\_

*For Unit head disclosures, signature of Unit Head's immediate supervisor*

**Please provide a detailed explanation of why a disclosed interest does not represent a potential conflict, or of what action you recommend to address a conflict.**



### Who needs to disclose?

Annual disclosures must be completed by the following:

- All full-time or part-time tenured or tenure track faculty;
- All visiting faculty who will be engaging in research or sponsored programs during their visit;
- All Research Scientists and Research Associates;
- Any emeriti faculty who are conducting research or sponsored programs under University auspices; and
- Anyone else, including post-docs, whose University appointment involves the conduct of research or sponsored programs as an integral part of that appointment.
- Others, including staff and students, who do not generally engage in research or sponsored programs, may become involved in a particular research project or other sponsored program. They are required to complete a conflicts disclosure at the time they are identified to participate in the design, conduct, or reporting of a research project or sponsored program.
- If you are the Principal Investigator on a research project or sponsored program, you are responsible for ensuring that all faculty, students, post-docs, and others involved in the design, conduct, or reporting for that project or program, have completed disclosures that indicate whether they have any related outside significant financial interests.

### What does “research and sponsored programs” include?

- Research means all research conducted at or under the auspices of Indiana University, whether it is internally funded (by IU) or externally funded (by a state or federal agency, a private company, a foundation, or some other non-IU entity).
- Sponsored Programs means any externally funded project, whether it involves research or non research activities (e.g., a grant to perform service learning programs within the state)

### What types of financial interests are disclosable?

- Virtually any form of compensation that meets the relevant value threshold set out in the Conflict of Interest Policy and that comes from an outside (non-IU) entity. This includes royalty income and sale-of-equity distributions you receive under the University’s Intellectual Property Policy, which are made by the IU Research and Technology Corporation (formerly ARTI), an outside entity.
- The following interests from outside entities need NOT be disclosed:
  - Income from seminars, lectures, or other educational activities sponsored by not-for-profit entities;
  - Income from service on advisory committees or review panels for public or not-for-profit entities;
  - Any financial interest arising solely by means of investment in a mutual, pension, or other institutional investment fund as long as the individual does not exercise control over the management and investments of such fund.

### Do I need to disclose any outside financial interest that meets the value threshold, regardless of its relationship to my research or sponsored programs?

**NO:** You need only disclose when (a) your outside interest meets the value threshold, and (b) your interest, or the interests of the outside entity compensating you, reasonably would appear to affect or be affected by your University research or a sponsored program. So, if you own a substantial amount of stock in Dairy Queen but your research is wholly unrelated to and would have no effect on that company’s business, you need not disclose that interest.

### Why do I need to disclose?

- Faculty and others performing research or sponsored program at Indiana University (“Investigators”) create and disseminate knowledge through such activities. To protect Investigators and the University,



these activities must be conducted, and be perceived to be conducted, with the highest level of academic integrity and objectivity.

- Links with outside organizations can support and enhance University research and programs in a variety of ways; however, they can also raise concerns about real or apparent financial conflicts of interest, particularly when Investigators are paid or otherwise compensated for non-IU work by an outside company or organization whose interests reasonably may be affected by the Investigator's work here at IU. Like it or not, money is generally perceived to be a powerful motivator in our society, and when outside compensation exceeds a certain amount, people may question whether research and programs conducted at IU may be improperly influenced, consciously or unconsciously, by the impact that work could have on the Investigator's outside sources of income. Heightened concerns tend to exist when the research involves human subjects, or when students supervised academically by faculty with outside financial interests are involved in either the faculty's University research and programs or their outside activities.
- Accordingly, University policy requires that all Investigators complete an annual disclosure of significant external financial interests that reasonably relate to their work at IU.
- Conflicts are an inevitable part of the growing ties between the academy and outside organizations, and as long as they are disclosed and understood, generally they can be managed and resolved. In fact, disclosure is often the primary tool used to address the concerns raised by a conflict.

### **How do I make my disclosure?**

- Please complete the questions on the disclosure form and submit it to your unit head. Please be sure to include all information requested, including the unit of your primary appointment.
- You do not need to disclose the exact amount of any outside financial interest related to your research, only that it meets the threshold. However, please note that for outside financial interests relating to human subjects research, the monetary threshold does not apply, and any outside financial interest must be disclosed in response to Question #1.
- The Office of Research Compliance will review the form to determine whether the impact your IU research or sponsored programs may have on your outside financial interests or the interests of an outside entity that compensates you for non-IU work, or the impact those interests may have on your IU research or sponsored programs, creates a conflict of interest. In other words, this is a two-step process: you disclose outside interests that reasonably relate to your IU research and sponsored programs, and the Office of Research Compliance, with the Bloomington Campus Conflict of Interest Committee, determines whether or not the link between the two is close enough to pose a conflict. If a conflict exists, the Office will work with you to identify steps that can avoid, mitigate, or eliminate the conflict. It will then send your disclosure, and the proposed resolution of identified conflicts, to the Bloomington Campus Conflict of Interest Committee. The committee will either agree with the proposed resolution or propose other means of addressing the conflict. The final decision on how to resolve a conflict of interest rests with the Vice Provost for Research, advised by the Bloomington Conflict of Interest Committee.

### **Are there other Conflict of Interest Disclosures that may be required? What if I have an interest in a contract with the University in an area that doesn't relate at all to my research or work for the University?**

The attached Financial Conflicts Disclosure Form covers interests that relate to research and sponsored programs under the Policy on Financial Conflicts of Interests in Research. Indiana University also has a Policy on Conflicts of Interest that incorporates Indiana state law regarding conflicts of interest. The University's general conflicts policy and Indiana state law is not limited

# Instructions for Completing a Conflicts Disclosure

## Indiana University Bloomington



to interests relating to research and sponsored programs. State law makes it a felony for IU employees (including an employee's spouse, children, or other dependents) to knowingly or intentionally have a personal financial interest in, or derive a profit of \$250 or more from, "a contract or purchase connected with an action by [the University]," unless this interest is disclosed in writing to the Board of Trustees. The University expects that employees will also comply with this state law and the general Policy on Conflicts of Interest. Disclosures must be made on the State Conflicts Disclosure form. For more information about the State Disclosure form and to download a copy, visit <http://www.research.indiana.edu>, under the Research Compliance and Conflict of Interest section.

### **When I assign textbooks or materials that I authored to my IU students, should I disclose this? If so, do I disclose on this form "Financial Conflict of Interest Disclosure Form" or the State Conflicts Disclosure form?**

One could read the state conflicts law to cover situations in which a professor receives more than \$250 in royalties for the year from sales of the professor's textbooks or other authored materials that are required for her IU classes. Therefore, you should disclose this interest on the "State Conflicts Disclosure Form." It is not required to be disclosed on the attached Financial Conflicts Disclosure Form relating to research and sponsored program activity. The reasoning is that in such circumstances, the professor knowingly receives a financial benefit above the \$250 threshold for "purchases in connection with an action by the University"—namely, purchases by the students resulting from the professor's action, using her authority as a University faculty member to design her courses and choose course materials. Therefore, the University has advised faculty in such circumstances that it is prudent to file a state conflicts disclosure with respect to royalties above \$250 a year obtained from materials assigned to their IU students. You should indicate on the disclosure form the pedagogical connection between the assigned materials and the course subject matter.

### **Questions?**

Contact the Conflict of Interest Administrator at [coi@indiana.edu](mailto:coi@indiana.edu) or (812)855-0516.

For additional information go to the Conflicts of Interest section of the Research website: <http://www.research.iu.edu>.

*Thank you very much for your cooperation!*