

## Financial Disclosure Form for Investigators in Federally-Sponsored Research Cover Memorandum

### **PURPOSE**

This memorandum provides guidance in the disclosure of Significant Financial Interests pursuant to Appendix C of the POLICY ON CONFLICTS OF INTEREST AND COMMITMENT FOR FACULTY AND INVESTIGATORS. **Please read and sign before completing the Disclosure Form.**

### **DISCLOSURE BY INVESTIGATORS**

The Financial Disclosure Form must be completed by Investigators who plan to participate in federally-funded research or who are engaged in federally-funded research. Investigators must disclose Significant Financial Interests, and those of the investigator's spouse/domestic partner and dependent children, that reasonably appear to be related to the investigator's institutional responsibilities. The University will assess the disclosures for the purpose of determining whether Significant Financial Interests constitute a financial conflict of interest that could directly and significantly affect the design, conduct, or reporting of a federally funded research project.

Each Investigator participating in federally-funded research, including NIH-funded work, must update his or her disclosure annually during the period of the award to reflect any information not disclosed initially or updates to any previously-disclosed Significant Financial Interests. Investigators are also required to report new Significant Financial Interest within 30 days of discovering or acquiring the interest.

Investigators, including subrecipient Investigators following GW Policy, must disclose the following:

- (a) Any remuneration, regardless of amount, received from (i) a foreign institution of higher education, including any affiliated research institutes; (ii) a foreign academic teaching hospital or medical center; and/or (iii) the government of a foreign country (which includes local, provincial, or equivalent governments of another country).
- (b) Gifts in support of research regardless of value and without regard for whether the source is domestic or foreign.
- (c) Investment, advisory, or board positions in any for-profit company, whether domestic or foreign.
- (d) Academic, professional, or institutional appointments or affiliations outside of GW, whether foreign or domestic, for-profit or non-profit. This disclosure obligation is without regard for whether remuneration is received, and/or whether the position is full-time, part-time, visiting, adjunct, honorary, temporary or voluntary.

### **DEFINITIONS**

"Institutional Responsibilities" means an investigator's professional responsibilities on behalf of the University, which may include for example: activities such as research, research consultation, teaching, professional practice, University committee memberships, and service on panels such as Institutional Review Boards or data and safety monitoring boards.

"Investigator" means the project director or Principal Investigator and any other person, regardless of title or position, who is responsible for the design, conduct or reporting of research funded by federal sponsors, which may include, for example, consultants or collaborators.

“Research” means a systematic investigation, study or experiment designed to develop or contribute to generalizable knowledge relating broadly to public health, including behavioral and social-sciences research. The term encompasses basic and applied research (e.g., a published article, book or book chapter) and product development (e.g., a diagnostic test or drug).

“Significant Financial Interest” means a financial interest<sup>1</sup> consisting of one or more of the following interests of the investigator (and those of the investigator’s spouse/domestic partner and dependent children) that reasonably appears to be related to the investigator’s institutional 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 investigator (or the investigator’s spouse/domestic partner or dependent children) holds any equity interest (e.g., stock, stock option, or other ownership interest);

(c) Intellectual property rights and interests (e.g., patents, copyrights), upon receipt of income related to such rights and interests; or

(d) The occurrence of certain reimbursed or sponsored travel.<sup>2</sup>

Income from seminars, lectures, teaching engagements, advisory committee service, or review panels and reimbursed or sponsored travel when such activities are sponsored by a U.S. governmental entity; an institution of higher education, academic teaching hospital, and medical center in the U.S.; and a research institute that is affiliated with an institute of higher education or a related entity in the U.S., do not require disclosure.

**I certify that I have read and understood the information provided in this document.**

Signature \_\_\_\_\_ Date: \_\_\_\_\_  
Print Name

<sup>1</sup> A financial interest is anything of monetary value, whether or not the value is readily ascertainable.

<sup>2</sup> Sponsored travel means travel that is paid on behalf of the Investigator and not reimbursed to the Investigator (so that the exact monetary amount may not be readily determined). Travel that is reimbursed or sponsored by the following types of entities is excluded from reporting: U.S. federal, state or local government agencies; U.S. institutions of higher education or research institutes affiliated with them; U.S. academic teaching hospitals; or U.S. medical centers.

Financial Disclosure Form for Investigators in Federally-Funded Research

Pursuant to Appendix C of the George Washington University  
Policy on Conflicts of Interest and Commitment for Faculty and Investigators

This form must be completed by investigators who plan to participate in research funded, or proposed to be funded, by the federal government. Please answer **all** of the questions. Do **not** leave any questions blank. If a question does not apply to you, simply put "N/A" or "None" in the box. Once completed, this form should be sent by email to [rescomp@gwu.edu](mailto:rescomp@gwu.edu) for filing. It is also recommended that you save an electronic copy of your completed form for future reference and updates. If the form is associated with a project currently pending, please also let us know in the body of the email to [rescomp@gwu.edu](mailto:rescomp@gwu.edu).

**GWID:** \_\_\_\_\_

**Investigator Name:** \_\_\_\_\_

**Department/Unit:** \_\_\_\_\_

**School/Unit:** \_\_\_\_\_

**Title of Proposal:** \_\_\_\_\_

**Project PI:** \_\_\_\_\_

**Sponsor:** \_\_\_\_\_

This form asks you to provide information regarding outside financial interests that are or reasonably appear to be related to your institutional responsibilities at GW. Please note that this is a personal form.

Significant Financial Interests

(1) Have you received any remuneration, gift, or in-kind support, regardless of amount, from a foreign institution of higher education, foreign academic teaching hospital, and/or the government of a foreign country (which includes local, provincial, or equivalent governments of another country)?

Yes

No

(2) Have you negotiated participation or participated in a Foreign Talent Recruitment Program by a foreign institution of higher education, foreign academic teaching hospital, and/or the government, at any level, of a foreign country?

Yes  No

If you answered Yes to question 1 or 2, please provide additional details, including identifying the foreign entity, describing your relationship to it, and including the approximate value of any remuneration received.

**Definition:**

Foreign Talent Recruitment Program: means any program sponsored by, or benefit offered (whether in the form of remuneration or in-kind support) by a foreign researcher, foreign government (at any level), foreign institution, or foreign government-controlled entity for the purpose of facilitating the transfer or acquisition of expertise, technical know-how, research results/data/designs, or technology. These programs may involve entering into a contract with a foreign institution or entity and may be accompanied by an honorary, adjunct, or temporary appointment.

Significant Financial Interests in *Publicly-Traded* Entities

(3) Do you, your spouse/domestic partner, or your dependent children have any of the following interests in a publicly-traded entity that, alone or when aggregated, exceeds \$5,000 and that is or reasonably appears to be related to your institutional responsibilities at GW:

- Remuneration (such as consulting fees, honoraria, or paid authorship) received in the last twelve months
- Equity interest (stock, stock options, or other ownership interest)

If so, please provide details, including the name of the outside entity, the nature of the activity for which remuneration was received, the amount of remuneration received over the last twelve months, the value of any equity interest as of the date of this disclosure (as determined through reference to public prices or other reasonable measures of fair market value), the

percentage of ownership interest in the outside entity, and the manner in which the equity interest was acquired.

Significant Financial Interests in *Non-Publicly-Traded* Entities

- (4) Have you, your spouse/domestic partner, or your dependent children received from a non-publicly traded entity over the last twelve months any remuneration (such as consulting fees, honoraria, or paid authorship) that alone, or when aggregated, exceeds \$5,000 and that is or reasonably appears to be related to your institutional responsibilities at GW? (A non-publicly-traded entity may be for-profit, non-profit, or governmental, but does not include GW.)

If so, please provide details, including the name of the outside entity, the nature of the activity for which payment was received, and the amount of the remuneration received over the last twelve months.

- (5) Do you, your spouse/domestic partner, or your dependent children hold, in a non-publicly-traded entity, any equity interest (e.g., stock, stock option, or other ownership interest) that is or reasonably appears to be related to your Institutional Responsibilities at GW? (Please note that this question applies to any equity interest, regardless of value.)

If so, please provide details, including the name of the outside entity, the dollar value and percentage of ownership interest in the outside entity, and the manner in which the equity interest was acquired.

Intellectual Property Rights and Interests

- (6) Do you, your spouse/domestic partner, or your dependent children have any intellectual property rights and interests (e.g., patents and copyrights) from which you or they have received any related income in the last twelve months and that are or reasonably appear to be related to your institutional responsibilities at GW? (Please note that this question applies regardless of the value of the income received. You need not disclose intellectual property rights assigned to GW and agreements to share in royalties related to such rights.)

If so, please provide details, including the nature of the intellectual property rights and interests, how they were acquired, and the amount of income received.

Reimbursed or Sponsored Travel

- (7) Please disclose any reimbursed or sponsored travel, regardless of value that occurred in the last twelve months and that is or reasonably appears to be related to your institutional responsibilities at GW. (You need not disclose travel that is reimbursed or sponsored by GW, a Federal, state, or local government agency, an institution of higher education, an academic teaching hospital, a medical center, or a research institute that is affiliated with an institution of higher education.)

- (a) What was the purpose of the trip?

- (b) What is the name of the organization that reimbursed or sponsored the travel?

- (c) What was the destination of the trip?

(d) What was the duration of the trip?

Federally-Funded Proposals or Awards

(8) Do you believe that any of the Significant Financial Interests you described in response to Questions (1)-(5) relate to any federally funded proposal or award on which you are an Investigator? Please explain.

Note: A Significant Financial Interest relates to federally-funded research if (a) the Significant Financial Interest could be affected by the federally-funded research or (b) the Significant Financial Interest is in an entity whose financial interest could be affected by the research.

**I certify that all of the foregoing information in this form is true and complete to the best of my knowledge. I acknowledge that, during the period of a federally-funded award, I am required to update this form annually and within 30 days of discovering or acquiring a new Significant Financial Interest.**

\_\_\_\_\_  
Signature

\_\_\_\_\_  
Date

\_\_\_\_\_  
Full Name (Printed)

\_\_\_\_\_  
Position Title