

POLICY ON CONFLICTS OF INTEREST AND COMMITMENT
FOR FACULTY AND INVESTIGATORS

Appendix B

Proposal-Specific Investigator Financial Interest Disclosure Questionnaire

**Pursuant to The George Washington University Policy on Conflicts of Interest
and Commitment for Faculty and Investigators**

The Faculty Senate and the Board of Trustees have approved a University-wide *Policy on Conflicts of Interest and Commitment for Faculty and Investigators*. The full policy is available at my.gwu.edu/files/policies/ConflictofInterestandcommitment.pdf. Pursuant to the policy, persons responsible for the design, conduct, or reporting of University sponsored programs (hereinafter “Investigators”) must review the Policy and Appendix B, and complete the one page disclosure form found at the end of this Appendix for each proposal submitted for external funding.

The purpose of this questionnaire is to assist faculty, Investigators, and the University in the identification and management of potential and actual conflicts of interest and to support compliance with applicable government regulations. Because of the complexities of The George Washington University, it is not unusual for an employee to respond affirmatively to one or more of the following questions. An affirmative response in no way implies that a conflict of interest necessarily exists or, if it does, that it cannot be managed.

The term *significant financial interest* means

- (1) any stock, stock option, or similar ownership interest in an outside entity by the Faculty Member or Investigator that, alone or together with interests of immediate family members, is valued at least at the lesser of \$10,000 or five percent of the total ownership interests in the outside entity, excluding any interest arising solely by reason of investment by a mutual, pension, or other institutional investment fund over which neither the Faculty Member, Investigator nor an immediate family member exercises control; or
- (2) receipt, individually or collectively by a Faculty Member, Investigator and immediate family members of, or the right or expectation to receive, income, whether in the form of a fee (e.g., consulting), salary, allowance, forbearance, forgiveness, interest in real or personal property, dividend, royalty derived from the licensing of technology or other processes or products, rent, capital gain, real or personal property, or any other form of compensation, or any combination thereof, that over the last 12 months exceeded or over the next 12 months is expected to exceed \$10,000 in income of all types; or
- (3) that the Faculty Member, Investigator, immediate family member or close family member provides services as a principal investigator for, or holds a management position in, an outside entity; or

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(4) that a close family member holds an ownership interest in an outside entity or has a right to receive income from an outside entity, if such ownership interest or right to receive income would be treated as a “significant financial interest” with respect to a Faculty Member or Investigator under (1) or (2), above.

Significant financial interest does not include: (1) salary, royalties or other remuneration from the University; (2) income from seminars, lectures, or teaching engagements sponsored by public or non-profit entities; or income from service on advisory committees or review panels for public or non-profit entities.

The George Washington University (and University) means The George Washington University and any entity owned in whole or in part, directly or indirectly, or controlled by the University, including the Medical Faculty Associates (MFA) and any joint venture.

Gifts do not include honoraria (e.g., remuneration or gifts-in-kind) received in connection with (1) participation in seminars, lectures, or teaching engagements sponsored by public or non-profit entities or (2) service on advisory committees or review panels for public or non-profit entities.

Immediate family member includes an Investigator’s spouse/domestic partner and dependent children.

Close family member includes an Investigator’s non-dependent children, as well as father, mother, sisters and brothers of the Investigator and the Investigator’s spouse/domestic partner.

To your knowledge means your actual knowledge or knowledge that you should reasonably be expected to have based on information that has been provided to you or is in your possession. *To your knowledge* does not imply a duty to make inquiries to discover facts that are not known to you or to obtain information that has not been provided to you or is not in your possession.

B. Questions as to Investigator and Immediate Family Members

1. Do you have, or does any immediate family member have, any of the relationships, transactions, activities, or financial interests described below in subparagraphs (a) through (g)?

(a) An outside entity in which you have or an immediate family member has a significant financial interest has made, or will make, a gift to The George Washington University of cash or property that will be under your control or will directly support this sponsored project.

(b) You have or an immediate family member has a significant financial interest in the proposed or current sponsor of, or a proposed or current subcontractor, vendor, or collaborator for, this sponsored project.

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- (c) You have or an immediate family member has an actual or proposed technology licensing or commercialization arrangement with the proposed or current sponsor of, or a proposed or current subcontractor, vendor, or collaborator for, this sponsored project.
- (d) You are or will be personally involved in, or you have or will have the ability to influence the formation or implementation of, a transaction to procure property, goods, or services for this sponsored project from an outside entity in which you have or an immediate family member has a significant financial interest.
- (e) The design, conduct or reporting of this sponsored project does impact or will impact a significant financial interest that you hold or an immediate family member holds in an outside entity.
- (f) You are or an immediate family member is a director, officer, sole owner, partner, employee, agent, consultant, or advisor of a business enterprise that to your knowledge supplies or will supply The George Washington University with any property, goods, or services for this sponsored project.
- (g) You have or an immediate family member has a significant financial interest in a business enterprise that to your knowledge supplies or will supply The George Washington University with any property, goods, or services for this sponsored project.

2. In the past 12 months, to the best of your knowledge, have you or has any immediate family member received a loan of money, property, or services in the amount of \$250 or more (excluding any loan from a bank or other financial institution), or received a gift of money, property, services, or out-of-home entertainment with a value exceeding \$100, from:
(a) a business enterprise that to your knowledge supplies property, goods, or services to The George Washington University, or (b) a business enterprise (other than The George Washington University) that engages in the business of higher education or patient care services, or (c) the sponsor of, or a subcontractor, vendor, or collaborator for, this sponsored project?

3. Do you have or does any immediate family member have any other relationships, commitments, or activities that might reasonably be perceived as involving, or creating the appearance of, a conflict of interest with respect to your involvement in this sponsored project?

If your answer to any of the above Questions 1-3 is Yes, please give details, including identifying the business enterprise(s) and describing your or your immediate family member's relationship to it, as well as the approximate value of any income or financial interest, loan or gift. (Where more space is required for your answers, please attach additional pages to this questionnaire.)

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C. Questions as to Investigator and Close Family Members

1. To your knowledge, do you have or does any close family member have any of the relationships, transactions, activities, or financial interests described below in subparagraphs (a) through (f)?

(a) An outside entity in which a close family member has a significant financial interest has made, or will make, a gift to The George Washington University of cash or property that will be under your control or will directly support this sponsored project.

(b) A close family member has a significant financial interest in the proposed or current sponsor of, or a proposed or current subcontractor, vendor, or collaborator for, this sponsored project.

(c) You are or will be personally involved in, or you have or will have the ability to influence the formulation or implementation of, a transaction to procure property, goods, or services for this sponsored project from an outside entity in which a close family member has a significant financial interest.

(d) The design, conduct or reporting of this sponsored project does impact or will impact a significant financial interest that a close family member holds in an outside entity.

(e) A close family member has an actual or proposed technology licensing or commercialization arrangement with the proposed or current sponsor of, or a proposed or current subcontractor, vendor, or collaborator for, this sponsored project.

(f) A close family member is a director, officer, sole owner, partner, employee, agent, consultant, or advisor of, or has a significant financial interest in, a business enterprise that to your knowledge supplies or will supply The George Washington University with any property, goods, or services for this sponsored project.

2. In the past 12 months, to your knowledge, has a close family member received a loan of money, property, or services in the amount of \$250 or more (excluding any loan from a bank or other financial institution), or received a gift of money, property, services, or out-of-home entertainment with a value exceeding \$100, from: (a) a business enterprise that to your knowledge supplies property, goods, or services to the George Washington University, or (b) the sponsor of, or a subcontractor, vendor, or collaborator for, this sponsored project?

3. To your knowledge, does a close family member have any other relationships, transactions, activities, or financial interests that might reasonably be perceived as involving, or creating the appearance of, a conflict of interest with respect to your involvement in this sponsored project?

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Proposal-Specific Investigator Financial Interest Disclosure Form

I have read the Policy on Conflicts of Interest and Commitment for Faculty and Investigators and Appendix B to the Policy and certify to the best of my knowledge:

_____ No, I do NOT have any conflicts as described by the Policy or Appendix B.
_____ Yes, I do have a conflict(s) as described by the Policy or Appendix B.

Faculty Member or Investigator Name: _____
Department/Unit: _____
Sponsor: _____
Title: _____

If you answered YES to the above question, please give details, including identifying the business enterprise(s) and describing your, your immediate or close family member's relationship to it, as well as the approximate value of any income or financial interest, loan or gift. (Where more space is required for your answers, please attach additional pages to this questionnaire.)

Signature Date

Department Chair/Unit Head & College Dean/Director – Comments and Recommended Actions

_____ To the best of my knowledge, there is no perceived or inappropriate activity or conflict.
_____ I have reviewed this disclosure and recommend the following actions be taken:

Printed Name and Signature – **Dept. Chair/Unit Head** Date

_____ To the best of my knowledge, there is no perceived or inappropriate activity or conflict.
_____ I have reviewed this disclosure and recommend the following actions be taken:

Printed Name and Signature – **College Dean/Director** Date