



FINANCIAL INTERESTS/OBLIGATIONS/PROPRIETARY INTERESTS DISCLOSURE (FID) FORM

Reference: OSP Policy No. 16 – Policy on Financial Conflict of Interest in Sponsored Programs

Instructions:

Project Directors/Principal Investigators (PD/PI) are required to complete one FID form on behalf of the Study Team. Individuals on the Study Team must disclose all their Significant Financial Interests and/or those of their Family Members that reasonably appear to be related to the Investigator's institutional responsibilities to the Office of Research and Technology Transfer according to the process defined in OGC Policy No. 16 - Policy on Financial Conflict of Interest in Sponsored Programs. Prior to submitting this form, for proposals involving work with sub-awardees, subcontractors, and/or work at multiple sites, the PD/PI should consult OSP Policy No.16 for the process of disclosure.

Each Study Team member has an ongoing responsibility to disclose Significant Financial Interests/Obligations/Proprietary Interests related to the Investigator's institutional responsibilities prior to proposal submission and during the life of the award. The FID form may be used for this purpose. Once a proposal is awarded, the PD/PI, on behalf of the Study Team, will update the FID annually (by each June 30th following initial disclosure) during the life of the award. Additionally, the FID must be updated by the PD/PI on behalf of the Study Team, during the period of the award as new reportable financial interests are obtained within thirty (30) days of discovering or acquiring a financial interest.

Definitions:

Family Members: The Investigator's spouse, domestic partner, or dependent children.

Financial Interest: Anything of monetary value, whether or not the value is readily ascertainable, including but not limited to salary, commissions, consulting fees, honoraria, equity interests, interests in real or personal property, dividends, royalties, rent, capital gains, intellectual property rights, and forgiveness in debt.

Institutional Responsibilities: An Investigator's professional responsibilities on behalf of the University which may include activities such as research, research consultation, teaching, professional practice, Institutional committee memberships, and service on University panels.

Investigator: The project director or principal Investigator (PD/PI) and any other person, regardless of title or position, who is responsible for the design, conduct, reporting, or performing other substantive research activities for sponsored programs as defined herein. Investigators may include academic appointees, staff or students, sub-awardees, subcontractor, consultants, and to be appointed positions as well as any individual whose biographical sketch is included in the proposal or whose name appears in the budget (including subcontract budgets). Spouses, domestic partners, and dependent children are also included for the purposes of disclosure.

Obligations: Any formal and informal positions or relationships that would reasonably appear to be related to the Investigator's institutional responsibilities. Such positions might be paid or unpaid and include being an employee, consultant, member of a speakers bureau, lecturer (for any purpose including educational or promotional lectures), serving as an officer, board member (corporate, advisory, etc.), trustee, or director.

Proprietary Interests: All intellectual property rights that would reasonably appear to be related to the Investigator's institutional responsibilities.

Significant Financial Interest: Anything of monetary value, including, but not limited to, salary or other payments for services (e.g., consulting fees, honoraria, paid authorship); equity interests (e.g., stocks, stock options or other ownership interest); and intellectual property rights (e.g., patents, copyrights, and royalties from such rights), whether or not the value is readily ascertainable, that reasonably appears to be related to the Investigator's institutional responsibilities.

- With regard to any publicly traded entity, 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.
- With regard to any non-publicly traded entity, 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 or dependent children) holds any equity interest (e.g., stock, stock option, or other ownership interest);
- Intellectual property rights and interests (e.g., patents, copyrights), upon receipt of income related to such rights and interests.
- The occurrence of any reimbursed or sponsored travel (i.e., that which is paid on behalf of the Investigator and not reimbursed to the Investigator so that the exact monetary value may not be readily available), related to their institutional responsibilities, no matter the dollar level.

Excluded from this disclosure are the following financial interests:

- Salary, royalties, or other remuneration from the University if the Investigator is employed by the University;
- Income from investment vehicles, such as mutual funds and retirement accounts, as long as the Investigator does not directly control the investment decisions made in these vehicles even if higher than the \$5,000 significant financial interest threshold;
- Income from seminars, lectures, or teaching assignments sponsored by a federal, state, or local government agency of the U.S., an institution of higher education within the U.S. as defined at 20 U.S.C. 1001(a), an academic teaching hospital, a medical center, or a research institute that is affiliated with an institution of higher education within the U.S.;
- Income from service on advisory committees or review panels for a federal, state, or local government agency of the U.S., an institution of higher education within the U.S. as defined at 20 U.S.C. 1001(a), an academic teaching hospital, a medical center, or a research institute that is affiliated with an institution of higher education within the U.S.;
- Travel that is reimbursed or sponsored by a federal, state, or local government agency of the U.S., an institution of higher education within the U.S. as defined at 20 U.S.C. 1001(a), an academic teaching hospital, a medical center, or a research institute that is affiliated with an institution of higher education within the U.S.;
- Intellectual property rights assigned to the Institution and agreements to share in royalties related to such rights;

Sponsored Program: For purposes of the policy on Financial Conflict of Interest in Sponsored Programs, a sponsored program is a project or activity undertaken within the University pursuant to funding from an external source to support research, teaching/training and community service.

Sponsored Travel: Travel which is paid on behalf of the Investigator, but which is not reimbursed to the Investigator so that the exact monetary value may not be readily available.

Study Team: Any person, including the project director or principal Investigator, who is responsible for the design, conduct or reporting of the research described in the proposal including sub-awardee(s), sub-contractor(s), consultants and "to be appointed" positions as well as any individual whose biographical sketch is included in the proposal or whose name appears in the budget (including subcontract budgets). A Study Team member's spouses, domestic partners, and dependent children are also included for purposes of disclosure and conflict of interest review.

Project Description:

Project Director/Principal Investigator: _____

Full Academic Title: _____

College/Department/Division: _____

Is this a New FID or an Update to an existing FID: New FID Update to existing FID

Research Project Title: _____

Anticipated Sponsor(s) of Funding Sources: _____

Senior/Key Personnel: _____

Please list all contractor(s)/subcontractor(s) named in the proposal, including any non-University study site(s):

Are there any trainees (students, postdoctoral, fellows, etc.) who may participate in the proposed project?
 Yes No

To the best of your knowledge, does Nova Southeastern University or any institutional official have a financial interest (e.g. equity, royalty) related to the proposed activity?
 Yes No

Declaration of Financial Interests/Obligation/Proprietary Interests

The University requires declaration and disclosure of significant financial interests, obligations and proprietary interests that currently exist or have existed during the previous 12 months that reasonably appear to be related to the Investigator's institutional responsibilities. As PD/PI, you are completing this FID on behalf of the Study Team which includes any and all sub-awardees, subcontractor(s), and consultants as well as spouses, domestic partners, and dependent children. In completing this form, please be sure to reference *Policy No. 16 – Policy on Financial Conflict of Interests in Sponsored Programs* and the definitions set forth above.

1. Do you or any member of the Study Team have any significant financial interest, obligation, or proprietary interest that reasonably appears to be related to an Investigator's institutional responsibilities? Yes No Explain if Yes:

2. Do you or any member of the Study Team serve as a consultant, member of an advisory board (including scientific or trial design boards), member of a speaker's bureau, lecturer, or hold a position of management, such as board member, director, officer, partner or trustee with a sponsor, a vendor or (sub)contractor related to the proposed activity or an Investigator's institutional responsibilities? Yes No Explain if Yes:

3. Do you or any member of the Study Team have any significant financial interest, obligation, or proprietary interest in a publicly traded entity that reasonably appears to be related to the proposed activities or an Investigator's institutional responsibilities? Yes No Explain if Yes:

4. Do you or any member of the Study Team have any significant financial interest, obligation, or proprietary interest in a non-publicly traded entity that reasonably appears to be related to an Investigator's institutional responsibilities? Yes No Explain if Yes:

5. Do you or any member of the Study Team have any significant financial interest, obligation, or proprietary interest in a Sponsor, a vendor or (sub)contractor related to the proposed activity or to an Investigator's institutional responsibilities? Yes No Explain if Yes:

6. Do you or any member of the Study Team have any significant financial interest, obligation, or proprietary interest in a for-profit entity that will manufacture or commercialize any drug vaccine, device, project, procedure, or process that is associated with or that will predictably result from the proposed activity? Yes No Explain if Yes:

7. Do you or any member of the Study Team have any significant financial interest, obligation, or proprietary interest in a for-profit entity that can reasonably be expected to benefit directly and significantly from the design, conduct, or reporting of the proposed activity?
 Yes No Explain if Yes:

8. Do you or any member of the Study Team have any significant financial interest, obligation, or proprietary interest in a not-for-profit entity that can reasonably be expected to benefit directly and significantly from the design, conduct, or reporting of the proposed activity?

Yes No Explain if Yes:

9. Have you or any member of the Study Team assigned rights to a Sponsor, vendor or (sub) contractor related to the proposed activity for a disclosed intellectual property, pending patent application or an issued patent to an invention(s), or copyright for software?

Yes No Explain if Yes:

10. Do you or any member of the Study Team have a specific significant financial interest in any entity that can reasonably be expected to compete with the product or procedure that will predictably result from the work described in the application? Yes No Explain if Yes

11. Is it reasonable to anticipate that you or any member of the Study Team have significant financial interests that could directly and significantly be affected by the design, conduct, or reporting of the proposed activity? Yes No Explain if Yes:

12. Have you or any member of the Study Team received any reimbursed or sponsored travel related to an Investigator's institutional responsibilities? Yes No Explain if Yes:

13. Do you or any member of the Study Team receive payment from a third party that is or might appear to be affiliated with a sponsor, vendor or subcontractor involved in this proposed activity?

Yes No Explain if Yes:

14. Do you or any member of the Study Team receive payment from a third party that reasonably appears to be related to an Investigator's institutional responsibilities?

Yes No Explain if Yes:

15. Do you or any member of the Study Team have any ownership interests in an entity that is an applicant under Phase II or Phase III of the Small Business Innovation Research (SBIR) or Small Business Technology Transfer (STTR) Programs? Yes No Explain if Yes:

16. Do you or any member of the Study Team have any other financial interest, obligation, or proprietary interest for which you are unsure whether a potential conflict of interest exists?

Yes No Explain if Yes:

17. If "Yes" to any of the questions above, provide the name(s) of the Study Team member(s) with the financial interest/obligation/proprietary interest:

Each Study Team member named in #17 above is required to complete a separate **Individual Interest Disclosure (IID) form**. This form can be found at <http://www.nova.edu/fcoi>. These forms are confidential and must be submitted directly by the responding Study Team member to the Office of Sponsored Programs to be forwarded to the Office of Research & Technology Transfer for review.

PROJECT DIRECTOR/PRINCIPAL INVESTIGATOR CERTIFICATION

All PDs/PIs are required to certify the FID. Add additional signature pages if required. For proposals with multiple PDs/PIs, only one FID form is required but ALL PDs/PIs must sign the FID form. For proposals with co-investigators, only the PD/PI signs the FID form.

I certify that all answers to this declaration are accurate and truthful to the best of my knowledge. I agree to file an updated FID and IIF Form if and when the answers above change for any reason.

_____	_____	_____
Print Name	Signature	Date
_____	_____	_____
Print Name	Signature	Date
_____	_____	_____
Print Name	Signature	Date

FIRST-LEVEL REVIEW (DEAN/DIRECTOR)

I have reviewed this disclosure and:

- find no conflict of interest (no “Yes” responses on the FID form and no further review is required).
- find a potential conflict of interest exists and second-level review is required.

_____	_____
Dean/Director	Date

NOTE: Once the FID form is reviewed and signed by the dean/director indicating their finding, the form will be forwarded by the PI/PD (with all other required pre-award forms) to the Office of Sponsored Programs. The Office of Sponsored Programs will forward the FID to the Office of Research & Technology Transfer for Second-Level Review, as applicable, and signature.

In those instances where a FID indicates a Study Team member must complete an IID, the IID should be submitted by the Study Team member to the Office of Sponsored Programs for forwarding to the Vice President for Research and Technology Transfer for second-level review. Dean or director review of the IID is not required. All IIDs must be submitted prior to application submission for PHS-funded research.

SECOND-LEVEL REVIEW (VP-RESEARCH & TECHNOLOGY TRANSFER)

I have reviewed this disclosure and:

- no conflict of interest exists.
- a potential conflict of interest exists and completion/review of Individual Investigator(s) Disclosure(s) (IIDs) is required.

_____	_____
Gary Margules, Sc.D. VP-Research & Technology Transfer margules@nova.edu	Date