

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

Reference: OSP [Policy No. 16](#) – Policy on Financial Conflict of Interest in Sponsored Projects

Instructions:

Principal Investigators (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 individual’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 PI should consult OSP Policy No.16 for the process of disclosure.

Each Study Team member (i.e., Investigator) has an ongoing responsibility to disclose 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 must be used for this purpose. Once a proposal is awarded, the PD/PI, on behalf of the Study Team, will update the FID **annually** (30 days before anniversary start date of the award) during the life of the award. Additionally, the FID must be updated by the 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 and before a new Study Team member begins work on the award.

Project Description:

Type of Disclosure: New Disclosure Updated Disclosure Annual/Non-Competing Continuation
 Supplement to Award No Cost Extension

Principal Investigator: _____

Full Academic Title: _____

College/Department/Division: _____

Project Title: _____

Anticipated Sponsor(s) or Funding Sources: _____

Study Team Members: _____

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

Will the above listed contractor(s)/subcontractor(s) follow NSU’s Financial Conflict of Interest Policy (i.e., the organization does not have its own compliant policy)? Yes No

To the best of your knowledge, does Nova Southeastern University or any NSU 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 PI, you are completing this FID on behalf of the Study Team which includes any and all sub-awardees and subcontractor(s) 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 Interest in Sponsored Projects* and the definitions set forth below in Appendix A of this form.

NOTE: Any and all income from Foreign (non-U.S.) Outside Entities must be reported, including income from foreign academic institutions or higher education and any affiliated research institutes; foreign academic teaching hospitals or medical centers; foreign governments (including local, provincial, or equivalent foreign governments or foreign government agencies); and any other foreign entities.

1. Have you, your spouse or dependent children, or any member of your Study Team, received income or other remuneration (remuneration includes salary and any payment for services not otherwise identified as salary e.g. consulting fees, honoraria, paid authorship); equity interest including any stock, stock option, or other ownership interest as determined through reference to public prices or other reasonable measures of fair market value from a publicly traded entity, in the amount of \$5,000 or more within the prior 12 months?
 Yes No
2. Do you, your spouse or dependent children, or any member of your Study Team, have any equity / managerial interest from / in a publicly traded entity that is valued at \$5,000 or more within the prior 12 months?
 Yes No
3. Do you, your spouse or dependent children, or any member of your Study Team, receive income or other remuneration from a non-publicly traded entity in the amount of \$5,000 or more within the prior 12 months?
 Yes No
4. Do you, your spouse or dependent children, or any member of your Study Team, have any equity / managerial interest (e.g. stock, stock option, or other ownership interest) in a non-publicly traded entity in any amount within the prior 12 months?
 Yes No
5. Do you, your spouse or dependent children, or any member of your Study Team, receive income from any Intellectual Property rights and interest (e.g. Patents, licenses, royalties, and copyrights) other than from NSU, in a value of \$5,000 or more within the prior 12 months?
 Yes No
6. Have you, your spouse or dependent children, or any member of your Study Team, received reimbursed or sponsored travel income of any amount from a source other than a sponsored local, state or federal source or a U.S.-based institution of higher education?
 Yes No
7. Do you, your spouse or dependent children, or any member of your 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

8. If “Yes” to any of the questions above, provide the name(s) of the Study Team member(s) with a potential financial interest/obligation/proprietary interest:

Each Study Team member named in #8 above is required to complete a separate **Individual Interest Disclosure (IID)** form. This form can be found at <https://www.nova.edu/rtt/fcoi/index.html>. 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.

If you answered NO to all the questions above, please sign and obtain the additional required signatures for this form on the next page.

PROJECT PRINCIPAL INVESTIGATOR CERTIFICATION

All PIs are required to certify the FID. Add additional signature pages if required. For proposals with multiple PIs, only one FID form is required but ALL PIs must sign the FID form. For proposals with co-investigators, only the 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 IID Form if and when the answers above change for any reason.

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 Name Signature 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 determined that:

- 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

Appendix A.

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, subcontractors, 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 Projects, 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.