

UNIVERSITY of
NORTHERN COLORADO
DISCLOSING SIGNIFICANT FINANCIAL INTERESTS
FOR UNC INVESTIGATORS

The University of Northern Colorado's Financial Conflict of Interest Policy is found in the [University Regulations](#) Article 3, Part 4, Section 3-3-402(1), and the implementing procedures are found at <http://www.unco.edu/osp/policies/fcoiproc.pdf>. **Please review those documents and read the following before completing the disclosure form.**

Disclosure Requirements: As an investigator on an externally funded project or a proposal for external funding, you are required disclose your significant financial interests (SFI), aggregated with those of your spouse and dependent children, on the attached disclosure form.

- The Office of Sponsored Programs (OSP) must have disclosures prior to submitting your proposal for external funding.
- You are also required to submit a disclosure update during the period of any award funded by PHS or NSF (whether direct or pass through funding) within 30 days of discovering or acquiring any new financial interest (including those that may arise between the time the proposal is submitted and the time an award is made).
- You are also required to submit annual update disclosures during the period of any PHS funded award. These annual updates are due between November 1 and November 30 regardless of when you made your initial disclosure or disclosed new SFIs.

NOTE: UNC will not submit a proposal until all investigators (including any subrecipient investigators, if applicable) have submitted disclosures to the Office of Sponsored Programs. The PI is responsible for ensuring that all other Investigators submit their disclosures.

Training Requirement on PHS funded projects: Investigators on PHS funded awards are required to complete conflict of interest training before engaging in work related to the PHS funded award, and again every four years during any PHS funded award. The required training is available on-line through the Collaborative Institutional Training Initiative (CITI). To access CITI, follow the directions at: <http://www.unco.edu/osp/ethics/citi.html>; and on the CITI website, complete the **Financial Conflict of Interest** modules. You will need to affiliate your training with the University of Northern Colorado so that we receive notification from CITI when you have completed the training.

DISCLOSURE DEFINITIONS

- Remuneration includes all salary and any payment for services not otherwise identified as salary, such as consulting fees, honoraria, and paid authorships.
- Equity interest includes any stock, stock option, or other ownership interest with the value determined through public prices or other reasonable measures of fair market value.

DISCLOSURE EXCEPTIONS – DO NOT INCLUDE the following when disclosing financial interests:

- Salary, royalties, or other remuneration paid by UNC if you (or your spouse or dependent children, as applicable) are currently employed or otherwise appointed by UNC;
- Income related to intellectual property rights assigned to UNC or to agreements to share in royalties related to such rights;
- Income from investment vehicles such as mutual funds and retirement accounts for which you, your spouse and dependent children do not directly control the investment decisions made in such vehicles
- Income from seminars, lectures, or teaching engagements sponsored by a Federal, state, or local government agency, an institution of higher education 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 as defined at 20 U.S.C. 1001(a)
- Income from service on advisory committees or review panels for a Federal, state, or local government agency, an institution of higher education 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 as defined at 20 U.S.C. 1001(a)

You need to report only those Significant Financial Interests that are directly related to your responsibilities as an employee of the University of Northern Colorado.

DISCLOSURE DETAILS

When you complete the disclosure form (last page of this document), if you check to indicate that you are disclosing any changes to your significant financial interests, as listed in numbers 1 through 6, attach additional pages to your disclosure to provide details as listed below:

When responding, remember that, as the investigator, you are to disclose financial interests that are aggregated for yourself, your spouse, and your dependent children.

1. If you check #1 on the disclosure form, provide the following for each publicly traded entity involved:
 - The name of the publicly traded entity
 - The combined value of remuneration received and equity interest
 - An explanation of how you determined the value of your equity interest
 - An explanation of how this financial interest could or could not appear to be related to your research and other educational activities that are conducted as part of your institutional responsibilities
2. If you check #2 on the disclosure form, provide the following for each non-publicly traded entity involved:
 - The name of the non-publicly traded entity
 - Whether the financial interest was remuneration or equity interest
 - If it was remuneration, the value of that received
 - An explanation of how you determined the value of your equity interest
 - An explanation of how this financial interest could or could not appear to be related to your research and other educational activities that are conducted as part of your institutional responsibilities
3. If you check #3 on the disclosure form, provide a list of the intellectual property (copyrights, patents, etc.) and the value of income received from each
4. If you check #4 on the disclosure form, provide the following for each entity involved:
 - The name of the entity
 - The value of the equity interest
 - The percentage of ownership your interest represents in that entity
 - An explanation of how you determined the value of the equity interest
 - An explanation of how this financial interest could or could not appear to be related to your research and other educational activities that are conducted as part of your institutional responsibilities
5. If you check #5 on the disclosure form, provide the following for each instance of such travel:
 - The purpose of the travel
 - The entity that paid for the travel
 - The destination(s)
 - The dates of the travel

Please do not submit these guidelines with your disclosure form.

It is only the form on the next page that should be submitted to the Office of Sponsored Programs.

SUBMITTING DISCLOSURES:

The signed, completed form for any FCOI disclosure is to be submitted to:

Office of Sponsored Programs

Campus Box #143

Attention: Sherry May

Or a scanned copy may be emailed to sherry.may@unco.edu

All disclosures, must have manual or digital signatures; a typed name will not be accepted.

Save a copy of your disclosures for your project files.

University of Northern Colorado
Disclosure of Significant Financial Interests
UNC Investigator

Name: _____ Bear # (last 4): _____ Unit: _____

Name of PI/PD (if not you): _____ Your role on project: _____

Sponsor: _____

If this project is a subaward to UNC, the funding originates from: ☐ NSF ☐ Unit of PHS ☐ Other Sponsor

Title of Project: _____

Check one: ☐ Initial disclosure ☐ Update disclosing new significant financial interests ☐ Required annual update

Check all of the following that represent your significant financial interests when aggregated with those of your spouse and dependent children.

- ☐ 1. Remuneration received from any publicly traded entity during the 12 months preceding this disclosure, plus any equity interest in that entity as of the date of this disclosure, the combined value of which exceeds \$5,000.
- ☐ 2. Remuneration received during the 12 months preceding this disclosure from any non-publicly traded entity that exceeds \$5,000 in value, or any equity interest in that entity as of the date of this disclosure
- ☐ 3. Income related to intellectual property rights and interests.
- ☐ 4. Equity interest in any single entity, the value of which exceeds \$10,000 and represents more than a 5% ownership as of the date of this disclosure
- ☐ 5. Travel related to my responsibilities as a UNC employee that was paid on my behalf or reimbursed to me, excluding such travel that was paid by a Federal, state, or local government agency, an institution of higher education 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 as defined at [20 U.S.C. 1001\(a\)](#).

☐ The required details of significant financial interests I identified above are provided on attached pages.

☐ I have no significant financial interests to disclose at this time.

INVESTIGATOR CERTIFICATION

I have read the University of Northern Colorado policy on Financial Conflict of Interest Pertaining to Sponsored Programs, and I understand my responsibilities thereunder. I agree to comply with conditions or restrictions that may be imposed by the university to manage my real or perceived financial conflicts of interest. I understand that significant financial interests disclosed here do not necessarily constitute a financial conflict of interest, and I may be asked to provide additional information if it is needed to determine whether a financial conflict of interest does exist.

I certify that to the best of my knowledge, the information provided here is a complete and accurate disclosure of my significant financial interests as of the date of my signature below.

Signature _____

Date _____

NOTE: The signature must be dated

All information provided and records related to this disclosure will be held in confidence to the extent permitted by law and in accordance with UNC's Policy on Financial Conflict of Interest Pertaining to Sponsored Programs and the Implementing Procedures.

Approved: _____ Date: _____