

UW-Stevens Point Investigator's Financial
Disclosure Form for Federal Grants

- I. Accurate completion of this report is essential for compliance with NSF and HHS requirements. Grant proposals cannot be submitted to federal agencies unless this form is completed, signed and returned to your Department Chair and then to your Dean. To assure that any grant proposal will not be delayed, have this form completed. **Upload it under the Attachments tab in your WISPER record after it is signed by your Dean.** Update it throughout the year if circumstances change. Please see below for information on which types of financial interests are reportable.
- II. Faculty or Academic Staff involved in securing extramural funding from NSF or NIH must complete this section. Please check the applicable boxes below and fill in the requested information. If more space is necessary, attach a separate sheet.

I have no financial interests to report.

I and/or my immediate family receive or expect to receive payments totaling \$10,000 or more per year from a single for profit business enterprise that would reasonably appear to be affected by my research or educational activities which are funded or may be funded by federal agencies.

Name of Entity Making Payments	Type of Payment (salary, dividend, royalty, etc.)	Amount of Payment
_____	_____	_____
_____	_____	_____

I and/or my immediate family have ownership interests of 5% or greater, or ownership interests totaling \$10,000 or more, in a single for-profit business enterprise that would reasonably appear to be affected by my research or educational activities which are funded or may be funded by federal agencies.

Name of Entity Making Payments	Type of Payment (stock, partnership, interest, etc.)	% of Interest
_____	_____	_____
_____	_____	_____

I hereby certify that, to the best of my knowledge, the above information is correct.

Name: _____

Signature: _____ Date: _____

III. Department Chair and Dean are to complete this section.

I have reviewed the information itemized above and to the best of my knowledge find no potential conflict of interest.

I have reviewed the information itemized above and find a potential for conflict of interest. Accordingly, I have notified the faculty member, the Financial Disclosure Committee, and all other relevant parties.

Department Chair: _____

Signature: _____ Date: _____

College Dean: _____

Signature: _____ Date: _____

Glossary of Definitions --- from the Federal Register
Vol. 59:33308-33312 and 33242-33251, June 28, 1994 & Federal
Register Vol. 60:35810-35823, July 11, 1995

I. Types of interests that are reportable unless exempt under Section II:

Anything of monetary value that you and/or your immediate family received from for-profit businesses, including but not limited to:

- salaries or other payments for services (e.g., consulting fees or honoraria)
- equity interests (e.g., stocks, stock options, or other ownership interests)
- intellectual property rights (e.g., patents, copyrights, and royalties from such rights, including books if published by commercial presses)

II. Types of interest that are NOT reportable:

- salaries, royalties, or other payments from the University.
- income from seminars, lectures, or teaching engagements sponsored by public or nonprofit entities.
- income from advisory committees or review panels for public or nonprofit entities.
- payments from a single business if the entire amount of payments you and your immediate family together received is less than \$10,000.
- ownership interest in a business if you and your immediate family's ownership interests in the business together represent less than 5% or less than \$10,000 of the total ownership interests in the business.

III. IMMEDIATE FAMILY means your spouse and dependent children.

IV. Formula to determine whether a financial interest is reportable:

Step One: Do you and/or your immediate family have a financial interest from or in a for-profit business that is reasonably likely to be affected by the research or educational activities for which you have received or expect within the year to seek and receive funding? If not, then the interest is not reportable. If yes, go to Step Two.

Step Two: Do you and/or your immediate family together receive from such a business \$10,000 or more per year, or is the ownership interest you and your family have together in such a business 5% or more, or equal to or greater than \$10,000 in value, of the total ownership interest? If no, then the interest is not reportable. If yes, you must report the interest(s) on the other side of this form.

UW-STEVENS POINT

Investigator Financial Disclosure Policy

Filing Requirement

Consistent with applicable federal regulations (Federal Register Vol. 59:33242-33251 and 33308-33312, June 28, 1994 and Federal Register Vol. 60:35810-35823, July 11, 1995), and to assure timely processing of applications for federal funding, principal investigators (PIs) who apply for federal grants from the National Science Foundation (NSF) or National Institutes for Health (NIH) must complete a UW-Stevens Point Investigator's Financial Disclosure Form (IFDF) at the time they seek campus approval to submit the grant application(s).

Financial Disclosure Committee

The chancellor shall appoint a campus-wide Financial Disclosure Committee (FDC) to assist in the review of potential conflicts arising under this policy. The FDC shall consist of faculty and academic staff members who are experienced researchers and federal grant-seekers, as well as appropriate administrators. The chancellor may also designate a staff member to provide support to the FDC. The FDC shall meet as necessary to carry out its responsibilities under this policy.

Review Process

Within 10 working days of receipt, the PI's department chair or director must review, sign, and forward the IFDF to the appropriate Dean.

The Dean shall review the IFDF within ten working days of its receipt. If the Dean determines, after reviewing the IFDF, that no conflict of interest exists, s/he shall notify the PI, the FDC and the Associate Vice Chancellor for Personnel, Budget, and Grants of the determination. Upon such a determination by the Dean, the PI may proceed with the submission of the grant application or with the expenditure of any awarded research funds.

If the Dean determines, after reviewing the IFDF, that a potential for conflict of interest exists, s/he will notify the PI, the FDC, and the Associate Vice Chancellor for Personnel, Budget, and Grants of the potential conflict of interest. If a PI with a potential conflict of interest decides to proceed with the submission of a proposal to the NSF or NIH, the PI must also send an abstract of the proposal and an explanation of why there is no conflict, or an explanation of potential solutions to the conflict, to the FDC. If, after review of the submitted documentation, the FDC decides there is no conflict of interest, the FDC will notify the PI, the Dean, and the Associate Vice Chancellor for Personnel, Budget, and Grants.¹ If the FDC decides that there is no conflict of interest, the PI may proceed with the submission of the grant application or the expenditure of any awarded research funding.

If the FDC decides that a conflict of interest does exist, it will convene a meeting with the PI and the PI's Dean. At the meeting, any party may suggest ways to eliminate, resolve or manage the conflict of interest.² If the FDC, the PI, and the Dean agree on how to manage the conflict, the FDC will notify the

¹ A "no conflict of interest" determination could arise in the following circumstances: if the PI's income is not from a "for-profit" business, or, if the PI's income is from textbook writing.

² One way a conflict could be managed is for the FDC to appoint a 2-3 member project oversight committee. Ideally, members of a project oversight committee would have expertise in areas related to the PI's proposed research area. All project oversight committees would be required to file annual reports with the FDC concerning their ongoing role in the management of the conflict.

Associate Vice Chancellor for Personnel, Budget, and Grants that the conflict of interest is manageable and that the university can expend the federal grant if awarded.

If a conflict cannot be resolved or managed by the above process, an appeal process shall be provided. If a PI requests an appeal, the PI's Dean shall convene and preside over a (three to five) member appeals committee, consisting of at least one representative from the FDC, and other qualified persons appointed by the chancellor.

If the conflict is resolved or managed through the appeal process, the Associate Vice Chancellor for Personnel, Budget, and Grants shall be notified that the conflict of interest is manageable and the university can expend the federal grant if awarded. If the conflict is not resolved or managed through the appeal process, the university may not expend the federal grant.

If, during the course of the year, circumstances concerning an investigator's significant financial interests change, the investigator shall submit a revised IFDF to his/her department chair or director, and the above steps for reviewing the revised IFDF shall be followed.

The Associate Vice Chancellor for for Personnel, Budget, and Grants will maintain records of all PI financial disclosures and of all actions taken to resolve or manage potential conflicts of interest for at least 3 years after the termination or completion of the award to which they relate.