**SETON HALL UNIVERSITY**

**Financial Conflict of Interest Disclosure Form -Part 1**

|  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- |
| PROJECT TITLE: | | | | | | | | | | | | | | | |
| PRINCIPAL INVESTIGATOR: | | | | | DEPT: | | | | | | | PHONE: | | | |
| FUNDING AGENCY OR SPONSOR: | | | | | | | | PROJECT AMOUNT: | | | | START DATE: | | | |
| TYPE: | * RESEARCH | * EDUCATION/TRAINING | | | | | | | | | * SERVICE | | * OTHER | | |
| **NOTHING TO DISCLOSE:** **CHECK "NO" COLUMN BELOW**  I, my “family members” and “friends” do not have any “significant financial interests” that could be affected by this sponsored project. This includes any activities associated with procurement related to this project. All words in quotes are defined in the University’s Financial Conflict of Interest Policy that is attached.  **DISCLOSURE TO BE MADE:** **CHECK "YES" COLUMN BELOW**  I, my “family members” and “friends” DO/DOES have “significant financial interests” that could be affected by this sponsored project, as itemized on Part 2 of this form. This includes any activities associated with procurement related to this project. All words in quotes are defined in the University’s Financial Conflict of Interest Policy that is attached.  I certify that the information on this form is correct; that I have read and understood the Seton Hall University Financial Conflict of Interest Policy ; that, to the best of my knowledge, all required disclosure of significant financial interests has been made herein; that I will complete a Disclosure Form on an annual basis during the duration of the research, or more frequently as new interests are obtained or if my situation with respect to a potential conflict of interest otherwise changes since my original disclosure, and submit it to the Office of Grants and Research Services (OGRS) and the Office of Grants Accounting (OGA); that I will comply with any conditions or restrictions imposed by Seton Hall to manage, reduce or eliminate conflicts of interest caused by my interests. | | | | | | | | | | | | | | | |
| **NAME (PRINT & SIGN)**  **(see definition of "Investigator" on the reverse side)** | | | **NO** | **YES** | | **DATE** | | | **NAME (PRINT & SIGN)**  **(see definition of "Investigator" on the reverse side)** | | | | **NO** | **YES** | **DATE** |
| PRINCIPAL INVESTIGATOR: | | |  |  | |  | | | INVESTIGATOR: | | | |  |  |  |
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| INVESTIGATOR: | | |  |  | |  | | | INVESTIGATOR: | | | |  |  |  |
| **USE ADDITIONAL FORM(S) FOR ADDITIONAL INVESTIGATORS.**   * This project involves a contract, subcontract or collaboration with an outside institution or group. * Attached is a written assurance from an appropriate official of this outside entity that individuals from the outside entity who will participate in this project comply with the outside entity's investigator conflict-of-interest policy and that such policy meets the requirements of the PHS (42 CFR Part 50, Subpart F). * In the event the outside entity has no investigator conflict-of-interest policy, attached are a written assurance from an appropriate official of this outside entity that individuals from the outside entity who will participate in this project comply with Seton Hall University's Financial Conflict of Interest Policy, plus all Seton Hall Financial Conflict of Interest Disclosure Forms completed by these individuals. | | | | | | | | | | | | | | | |
| \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_  Signature of Dean (or VP if Dean is PI or co-PI) | | | | | | |  | | | \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_  Date | | | | | |
| \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_  Signature of VP (if project involves more than one college) | | | | | | |  | | | \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_  Date | | | | | |

(continued)

**INSTRUCTIONS AND DEFINITIONS**

*EACH* investigator must disclose all significant financial interests, as defined in the University’s Financial Conflict of Interest Policy, which would reasonably appear to be directly and significantly affected by the sponsored project proposed.

*EACH* "investigator," as defined below, on a research or training must complete his/her section of the Disclosure Form which must then be submitted with the proposal to OGRS and OGA, and, when human subjects are involved, to the IRB, and, when animal models are involved, to the IACUC. This requirement pertains to both funded and unfunded research and training activity.

The term "investigator" means:

* the principal investigator,
* co-principal investigators, co-investigators, and
* any other University personnel who, in the course of their association with the University are or will be responsible for the design, conduct, administration, collaboration, analysis and/or reporting of either research or training activities funded or proposed for funding by any sponsor, or of unsponsored research or training activities. These persons may include faculty, non-faculty employees, research associates, technicians, consultants, graduate and other students

*(NOTE: If one or more such individuals had not been named at the time of proposal submission, a form or forms must be subsequently completed by the individual(s) and submitted by the principal investigator to the OGRS and OGA)*

***If there is a significant financial interest requiring disclosure, provide on Part 2 of this form all relevant details about the relationship of the interest to the project, and sufficient information to determine if a conflict of interest exists, and how such a conflict of interest might be managed, reduced or eliminated. Use additional pages if needed. Be as specific as possible.***

**SETON HALL UNIVERSITY**

**Financial Conflict of Interest Disclosure Form -Part 2**

|  |  |  |  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- |
| PROJECT TITLE: | | | | | | | | | | |
| PRINCIPAL INVESTIGATOR: | | | | DEPT: | | | | | PHONE: | |
| FUNDING AGENCY OR SPONSOR: | | | | PROJECT AMOUNT: | | | | | START DATE: | |
| TYPE: | * RESEARCH | | * EDUCATION/TRAINING | | | * SERVICE | | | | * OTHER |
| NAME OF "INVESTIGATOR" MAKING DISCLOSURE /see definition of "Investigator" on the reverse side): | | | | | | | | | | |
| **DISCLOSURE TO BE MADE:** (I, my “family members” and “friends” DO/DOES have “significant financial interests” that could be affected by this sponsored project. This includes any activities associated with procurement related to this project. All words in quotes are defined in the University’s Financial Conflict of Interest Policy that is attached. | | | | | | | | | | |
| **NATURE OF INTEREST** | | | | | | | | **VALUE (DOLLAR AMOUNT)** | | |
| INCOME | | CONSULTING FEES | | | | | |  | | |
| HONORARIA | | | | | |  | | |
| LECTURE FEES | | | | | |  | | |
| OTHER PAYMENT FOR EMPLOYMENT OR SERVICES | | | | | |  | | |
| OTHER | | | | | |  | | |
| EQUITY | | STOCK, STOCK OPTIONS, WARRANTS (NUMBER OF SHARES:\_\_\_\_\_\_\_\_\_\_) | | | | | |  | | |
| OTHER OWNERSHIP RIGHTS | | | | | |  | | |
| INTELLECTUAL PROPERTY | | PATENTS OR PATENT APPLICATIONS | | | | | |  | | |
| COPYRIGHTS | | | | | |  | | |
| ROYALTIES | | | | | |  | | |
| LICENSING AND OTHER AGREEMENTS | | | | | |  | | |
| CONTRACTS | | | | | |  | | |
| OTHER | | | | | |  | | |
| POSITIONS/RELATIONSHIPS(COMPENSATED OR NOT) | | CORPORATE OFFICER | | | | | |  | | |
| BOARD OF DIRECTORS OR TRUSTEES | | | | | |  | | |
| ADVISORY BOARD | | | | | |  | | |
| OTHER | | | | | |  | | |
| I certify that the above information is correct; that I have read and understood the attached Seton Hall University Financial Conflict of Interest Policy; that, to the best of my knowledge, disclosure of all required financial and other personal interests has been made herein; that I will complete a Disclosure Form on an annual basis during the duration of the research or more frequently as new interests are obtained or if my situation with respect to potential conflict of interest otherwise changes since my original disclosure, and submit it to the and submit it to the Office of Grants and Research Services (OGRS) and the Office of Grants Accounting (OGA); that I will comply with any conditions or restrictions imposed by Seton Hall to manage, reduce or eliminate conflicts of interest caused by my interests. | | | | | | | | | | |
| \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_  Signature of Investigator Making Disclosure | | | | |  | | \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_  Date | | | |
| \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_  Signature of Department Chair or School Director | | | | |  | | \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_  Date | | | |
| \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_  Signature of Dean (or VP if interested party is a Dean) | | | | |  | | \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_  Date | | | |

(continued)

**INSTRUCTIONS AND DEFINITIONS**

*EACH* investigator must disclose all significant financial interests, as defined in the University’s Financial Conflict of Interest Policy, which would reasonably appear to be directly and significantly affected by the sponsored project proposed.

*EACH* "investigator," as defined below, on a research or training must complete his/her section of the Disclosure Form which must then be submitted with the proposal to OGRS and OGA, and, when human subjects are involved, to the IRB, and, when animal models are involved, to the IACUC. This requirement pertains to both funded and unfunded research and training activity.

The term "investigator" means:

* the principal investigator,
* co-principal investigators, co-investigators, and
* any other University personnel who, in the course of their association with the University are or will be responsible for the design, conduct, administration, collaboration, analysis and/or reporting of either research or training activities funded or proposed for funding by any sponsor, or of unsponsored research or training activities. These persons may include faculty, non-faculty employees, research associates, technicians, consultants, graduate and other students

*(NOTE: If one or more such individuals had not been named at the time of proposal submission, a form or forms must be subsequently completed by the individual(s) and submitted by the principal investigator to the OGRS and OGA)*

***If there is a significant financial interest requiring disclosure, provide on Part 2 of this form all relevant details about the relationship of the interest to the project, and sufficient information to determine if a conflict of interest exists, and how such a conflict of interest might be managed, reduced or eliminated. Use additional pages if needed. Be as specific as possible.***

# SETON HALL UNIVERSITY

# Financial Conflict of Interest Policy

# Creation Date: May 2016

**Policy Statement**

This policy establishes the requirements of the University regarding financial conflict of interest disclosure on externally sponsored project proposals and awards.

A conflict of interest exists when it can be reasonably determined that an investigator’s personal financial concerns could directly and significantly influence the design, conduct, or reporting of sponsored research activities. Faculty and staff of the University have an obligation to scrupulously maintain the objectivity of their sponsored project so as to avoid any conflict of interest.

**Reason for Policy**

Federal regulations require institutions of higher education to have policies and procedures in place that ensure that investigators disclose any significant financial interest that may present an actual or potential conflict of interest in relation to externally sponsored projects. This includes any activities associated with procurement related to such projects. Such disclosures must be made prior to the submission of the proposal for funding, and institutions must develop specific mechanisms by which conflicts of interest will be reviewed and satisfactorily managed, reduced, or eliminated prior to acceptance of an award. In addition, if a new reportable significant conflict of interest arises at any time during the period after the submission of the proposal through the period of the award, the filing of a disclosure is also required. To provide information to the University community regarding the contractual, financial, and administrative implications that result for the commitment to cost share.

# Who Must Comply

This policy applies to all investigators, family members and friends. “Investigator” is defined as the principal investigator, project director, co-principal investigators, and any other person at the University who is responsible for the design, conduct, or reporting of research or educational activities funds, or proposed for funding, by an external source. A “family member” is a spouse, parent, sibling, child, or any other relative. A “friend” is a personal or professional colleague that has actual or potential opportunity to reap some financial interest or gain from a transaction which is directly or indirectly related to the University. This policy applies to all University personnel who are eligible to submit proposals for external funding.

**Elements Subject to Disclosure**

Each investigator must disclose all significant financial interests:

* + - that would reasonably appear to be directly and significantly affected by the research or educational activity funded, or proposed for funding, by an external sponsor; or

in entities where financial interests would reasonably appear to be directly and significantly affected by such activities.

“Significant financial interests” means anything of monetary value, including, but not limited to, salary or other payment for services (e.g. consulting fees or honoraria); gifts; loans; equity interests (e.g. stocks, stock options or other ownership interests); the occurrence of any reimbursed travel or sponsored travel related to institutional responsibilities (not required for travel that is reimbursed by a federal, state, or local government agency, an Institution of Higher Education as defined at 200 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); and intellectual property rights (e.g. copyrights and royalties from such rights).

The term does not include:

* salary, royalties or other remuneration from the University;
* income from seminars, lectures, or teaching engagements sponsored by and service on advisory or review panels for a federal, state or local government agency, an Institution of Her 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.
* income 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.

**Roles and Responsibilities**

**Office of Grants and Research Services (OGRS)**

* Distribute Financial Disclosure form to Investigators prior to proposal submission.
* Review information obtained from investigators.
* Inform schools, departments and Investigators when issues are identified prior to proposal submission.

**Office of Grants Accounting (OGA)**

* Gather information and review existing Investigators on an annual basis.
* Inform schools, departments and Investigators when issues are identified prior to proposal submission.

**Procedures**

In accordance with federal regulations, all investigators with a potential conflict of interest as described above will identify the fact and make disclosure of the conflict prior to submission of the proposal. The following procedures outline the process for the monitoring of financial conflicts of interest.

**Reviewing and assessing Financial Conflicts of Interest**

* For proposal submission, Investigators will submit the Financial Conflict of Interest Disclosure Form to the OGRS.
* OGRS will obtain Financial Conflict of Interest Disclosure forms prior to each proposal submission.
* All new and active Investigators will be reviewed annually.
* OGA will annually obtain Financial Conflict of Interest Disclosure forms from all Investigators who have current externally sponsored projects.