

## GVSU Investigator Conflict of Interest Disclosure and Certification Form

The information collected on this Form will be maintained in a confidential manner by Grand Valley State University and will not be shared except with those who have a need to know for regulatory compliance purposes or required by law.

### Overview

Federal regulations and University policies require that individual's external interests/relationships be assessed relative to each scholarly activity (defined as: research, sponsored project, and/or technology transfer activity) in which they are engaged. This requires ongoing disclosure of external interests/relationships by researchers, and ongoing review by the University with respect to these activities. External interests/relationships are not inherently bad and do not automatically present Conflict of Interest (COI) concerns. A COI determination for a particular activity is made when an external interest/relationship relates to and could directly and significantly impact or bias the activity. COIs must be eliminated, reduced, or managed.

### Key points for research-related COI disclosure, review, and management processes

**Who must disclose?** Any personnel who are: a) listed on a sponsored project or technology transfer application, b) an 'Investigator' (an individual responsible for research design, conduct, or reporting) on research covered by GVSU policy, and/or c) named as PI/Co-I on protocols submitted to GVSU's Human Research Review Committee (HRRC) or GVSU's Institutional Animal Care and Use Committee (IACUC).

**What do I disclose?** Any Significant Financial Interests (SFIs) you (and those of your spouse and dependent children) related to your institutional responsibilities:

- Compensation/payments for service (> \$5,000 from single entity in previous year)
- Equity in non-publicly traded entity (any equity interests, even if valued at \$0)
- Equity in publicly traded entity (> \$5,000 value) in which you directly control investment decisions
- Intellectual property interests (> \$5,000 from single entity in previous year)
- Sponsored/reimbursed travel (> \$5,000 from a single entity in previous year)

**When do I disclose?**

- Prior to engaging in any research;
- At time of submitting a new Sponsored Project Application, Material Transfer Agreement, Data Use Agreement, Technology Transfer Agreement, HRRC protocol, and/or IACUC protocol;
- At time of receipt of external funds;
- Within 30 days of a *change in SFI(s)*; and
- At least annually

**Annual disclosure is not enough if you acquire/receive/obtain new SFIs throughout the year!** If you have no change in SFIs that arise throughout the year, annual disclosure is is sufficient (and required, even if acknowledging no change).

**What happens to my disclosure?** Your disclosure is initially reviewed by the research compliance specialists in the Office of Research Compliance and Integrity relative to each body of research activity. If additional review is required, the review is referred to the University's Research Integrity Officer. Final disposition for every project on which you are an 'Investigator' must be either '*No Conflict*' or '*Conflict Managed*'.

**What happens if a COI is identified?** The Office of Research Compliance and Integrity will work with you to reduce, manage, or eliminate any COIs. In most cases, a COI management plan will be implemented to mitigate even the perception of a lack of objectivity in the research due to the COI. The most common strategy for COI management is transparency relative to the relationship/interest through disclosure. If sponsor COI reporting is required, the Office of Sponsored Programs handles these requirements and will notify you if and when such reporting occurs.



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Investigator Name

Investigator Department

Email Address

Office Phone Number

Brief Description of Research Area

Reason for Disclosure

- Annual Disclosure
- Change in Existing Significant Financial Interest
- New Sponsored Project Application
- New Material Transfer Agreement, Data Use Agreement, or Technology Transfer Agreement
- New Human Research Review Committee (HRRC) Application
- New Institutional Animal Care and Use Committee (IACUC) Application

### Section I. Grand Valley State University Policy on Conflict of Interest in Research

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GVSU Investigators must:

1. Read and comply with Grand Valley State University's Conflict of Interest in Research Policy
2. Disclose all Significant Financial Interests that directly relate to the Investigator's Institutional Responsibilities (described in Section II).
3. Have an active SFI on file prior to engaging in research at GVSU.
4. (If PHS funded) Review and certify completion of Epigeum COI training module (located on the GVSU's Research Compliance and Integrity's Website).

### Section II. Definitions

**Investigator:** any individual listed on a sponsored project agreement or technology transfer agreement, and/or any individual acting as a project director or principal investigator and any other person, regardless of title or position, who is responsible for the design, conduct, or reporting of research.

**Institutional Responsibilities:** an Investigator's responsibilities on behalf of the University, such as research, teaching, and institutional committee memberships.

**Significant Financial Interest:** a financial interest consisting of one or more of the following interests of the Investigator (and those of the Investigator's spouse and dependent children) received from a single external entity in the 12 months prior to disclosure:

- Remuneration from an outside entity exceeding \$5,000
- Any equity interest in a non-publicly traded entity (even if valued at \$0)



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- Equity interests in publicly traded entities exceeding a value of \$5,000 in which the Investigator (and/or spouse/dependent children) directly control the investment decisions made in these vehicles
- Intellectual property rights exceeding \$5,000 not administered through GVSU
- Reimbursed travel expenditures exceeding \$5000 from a single entity and not falling under the exclusions below.

**EXCLUDED – Do not disclose:**

- Remuneration, intellectual property interests, equity in publicly traded entities, or sponsored or reimbursed travel received that aggregates to less than \$5,000 from a single entity in the previous 12 months;
- Remuneration or sponsored or reimbursed travel received for research, lectures, seminars, teaching engagements, or service on advisory committees or review panels relating to federal, state, or local government agencies, an institution of higher education, an academic teaching hospital, a medical center, or a research institute that is affiliated with an institution of higher education;
- Unlicensed intellectual property that does not generate income or is administered through an Investigator's home educational institution.
- Equity interests in publicly and non-publicly traded entities in the form of stock ownership through personal retirement accounts and mutual funds, as long as the investigator does not directly control the investment decisions made in these vehicles.

### Section III. Disclosure

Each Investigator must respond to the questions below. Disclose any of the interests indicated below -- **that directly relate to the Investigator's Institutional Responsibilities** -- in aggregate, relative to any single external entity received in the 12 months prior to this disclosure date. If a response to any question is "YES", the detail requested is required. If there are more than two entities, please attach additional copies of the form, as needed.

**1. Have you received remuneration from an entity that, when aggregated, totals more than \$5,000 in the previous 12 months?**

**Response:**

Yes       No

Entity #1 Name

Entity #2 Name

Remuneration Date

Amount

Remuneration Date

Amount

Reason for Remuneration

Reason for Remuneration



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**2. Do you hold any equity in non-publicly traded entities, or equity valued at more than \$5,000 in a publicly traded entity in which you directly control the investment decisions made in these vehicles?**

**Response:**

Yes  No

Entity #1 Name

Entity #2 Name

Date Acquired

Value

Date Acquired

Value

Form of equity (e.g., stock, stock options)

Form of equity (e.g., stock, stock options)

**3. Do you have any intellectual property rights from which you receive income that exceeded \$5,000 in the previous 12 months?**

**Response:**

Yes  No

Description of Intellectual Property

Description of Intellectual Property #2

Date Acquired

Value

Date Acquired

Value

Form (e.g., licensing, royalties)

Form (e.g., licensing, royalties)



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**4. Have you received sponsored or reimbursed travel from an entity that, when aggregated, totals more than \$5,000 in the previous 12 months?**

**Response:**

Yes     No

Entity #1

Entity #2

Date of Travel

Value

Date of Travel

Value

Reason for Travel (e.g., conference, board meeting)

Reason for Travel (e.g., conference, board meeting)

#### Section IV. Investigator Certification

I hereby affirm:

- I will adhere to GVSU's Conflict of Interest in Research Policy.
- I have reviewed and understand the COI training materials provided on the GVSU's Research Compliance and Integrity's website.
- I have completed Epigeum COI module (if PHS funded)
- The information I have provided in this Form is complete and accurate to the best of my knowledge.
- I understand that I will disclose all Significant Financial Interests related to my Institutional Responsibilities.

Signature:

Date:

Please forward this completed form to [rci@gvsu.edu](mailto:rci@gvsu.edu). If you have any questions regarding any question on this document please contact Benjamin Vesper in the Office of Research Compliance and Integrity ([rci@gvsu.edu](mailto:rci@gvsu.edu)). More information on Conflict of Interest Disclosure at Grand Valley State University can be found at <http://www.gvsu.edu/rci>.