

Metropolitan State University of Denver

DISCLOSING SIGNIFICANT FINANCIAL INTERESTS FOR MSU DENVER INVESTIGATORS

Metropolitan State University's Financial Conflict of Interest Policy is found in the [Policies and Procedures](#) section of the OSRP website (<https://msudenver.edu/osrp/policiesandprocedures/>). **Please review these 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 to disclose your significant financial interests (SFI), aggregated with those of your spouse and dependent children, on the attached disclosure form.

- The Office of Sponsored Research and Programs (OSRP) 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 (e.g., through purchase, marriage, or inheritance).
- 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: MSU Denver will not submit a proposal until all investigators (including any subrecipient investigators, if applicable) have submitted FCOI disclosures to the Office of Sponsored Research and Programs. The PI is responsible for ensuring that all other Investigators submit their disclosures.

Training Requirement: Investigators are required to complete conflict of interest training before engaging in grant related work, and again every four years during any grant funded award. The required training is available on-line through the Collaborative Institutional Training Initiative (CITI). To access CITI, follow the directions at: <https://msudenver.edu/irb/forresearchers/requiredciti/training/>; and on the CITI website, complete the "**Conflicts of Interest (ID:186377)**" module. You will need to affiliate your training with MSU Denver 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 MSU Denver to you, to your spouse and/or to dependent children (as applicable) if you are currently employed by MSU Denver;
- Income related to intellectual property rights assigned to MSU Denver 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 Metropolitan State University of Denver.

Please address questions regarding FCOI disclosures to Faith Fitzgerald at 303-605-52975389 or ffitzge1@msudenver.edu.

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 Research and Programs
Campus Box 4
PO Box 173362
Denver, CO 80217-3362
Attention: Faith Fitzgerald

Or a scanned copy may be emailed to ffitzge1@msudenver.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.

Metropolitan State University of Denver

Disclosure of Significant Financial Interests

MSU Investigator

Award #: _____

Proposal #: _____

Name: _____ Department: _____

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

Sponsor: _____

If this project is a subaward to MSU, 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 the following that represent significant financial interests.

- Income related to intellectual property rights and interests.
- Equity interest in any single entity (business ownership), which exceeds 5% ownership and \$10,000 in value for PI, spouse, and/or dependent children as of the date of this disclosure
- Travel related to my responsibilities as a MSU 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\(a\)](#).
- Remuneration received by :
 - Investigator, including equity interest (business ownership), received for any type of work during the last 12 months that exceeds \$5,000. (Exclude payments from MSU, or for teaching engagements and governmental advisory committee.)
and/or
 - Spouse: all payments, including salary, equity interest (business ownership), received for any type of work during the last 12 months that exceeds \$5,000. (Exclude payments from MSU, or for teaching engagements and governmental advisory committee.)
and/or
 - Dependent children: all payments, including salary, equity interest (business ownership), received for any type of work during the last 12 months that exceeds \$5,000. (Excludes payments from MSU, or for teaching engagements and governmental advisory committee. as of the date of this disclosure

- 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 Metropolitan State University of Denver's 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 MSU's Policy on Financial Conflict of Interest Pertaining to Sponsored Programs and the Implementing Procedures.