
Section 4. Investigator Certification

I affirm that I have read and understand the university's **Financial Conflict of Interest Policy for Federally Sponsored Research** [\[Insert link here\]](#). I hereby certify that the information I have provided on this form is complete and accurate to the best of my knowledge and that I will:

- Update the disclosure during the period of the award, either on an annual basis or as new reportable significant financial interests are obtained.
- Cooperate in the development of a Conflict of Interest (COI) Management Plan, if a COI is identified.
- Comply with any conditions or restrictions imposed by the university to manage, reduce, or eliminate conflicts of interests. Noncompliance or non-disclosure by an Investigator under this policy may initiate disciplinary proceedings in accordance with the university's Faculty Code and Faculty Bylaws, and all other campus-wide policies or other applicable policies as appropriate.

Electronic Signature [Click or tap here to enter text.](#)

Date [Click or tap to enter a date.](#)

Printed name: [Click or tap here to enter text.](#)

Purpose of this Form and Definitions

Federal regulations require universities to manage, reduce, or eliminate any actual or potential conflict of interest that may be presented by compensated outside activities and other financial interests of investigators (as defined below) involved in sponsored research projects funded by the Public Health Service (PHS) and the National Science Foundation (NSF). A conflict of interest exists when a significant financial interest could directly and significantly affect the design, conduct, or reporting of PHS- or NSF-funded research or educational activities.

An "investigator" is defined as the project director or principal investigator or any other person, regardless of title or position, who is responsible for the design, conduct, or reporting of research or educational activities under the terms of a federal grant or contract. This may include collaborators or consultants. For the purpose of determining a Significant Financial Interest, an "investigator" also includes an employee's spouse and dependent children.

A "Significant Financial Interest" is defined as a:

- 1) Financial interest consisting of one or more of the following interests of the Investigator (and those of the Investigator's spouse and/or dependent children) that reasonably appears to be related to the Investigator's Institutional Responsibilities:
 - a. Publicly Traded Entities. With regard to any publicly traded entity, a Significant Financial Interest exists if the value of any remuneration received from the publicly traded entity in the twelve months preceding the disclosure and the value of any equity interest in the entity as of the date of disclosure, when aggregated, exceeds \$5,000. For purposes of this definition, remuneration includes salary and any payment for services not otherwise identified as salary (e.g., consulting fees, honoraria, paid authorship); equity interest includes any stock, stock option, or other ownership interest, as determined through reference to public prices or other reasonable measures of fair market value;
 - b. Non-Publicly Traded Entities. With regard to any non-publicly traded entity, a significant financial interest exists if the value of any remuneration received from the non-publicly traded entity in the twelve months preceding the disclosure, when aggregated, exceeds \$5,000, or when the Investigator (or the Investigator's spouse and/or dependent children) holds any equity interest (e.g., stock, stock option, or other ownership interest); or
 - c. Intellectual Property. Intellectual property rights and interests (e.g., patents, copyrights), upon receipt of income related to such rights and interests.
- 2) Investigators also must disclose the occurrence of any reimbursed or sponsored travel (i.e., that which is paid on behalf of the Investigator and not reimbursed to the Investigator so that the exact monetary value may not be readily available), related to their Institutional Responsibilities; provided, however, that this disclosure requirement does not apply to travel that is reimbursed or sponsored by a federal, state, or local government agency, 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. Disclosure shall include the purpose of the trip, the identity of the sponsor/organizer, the destination, and the duration.
- 3) Exclusions. Significant Financial Interest does not include:
 - Salary, royalties, or other remuneration paid by the university to the Investigator if the Investigator is currently employed or otherwise appointed by the university, including intellectual property rights assigned to the university and agreements to share in royalties related to such rights;
 - Income from 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;
 - Income from seminars, lectures, or teaching engagements sponsored by a federal, state, or local government agency, 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; or

- 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, an academic teaching hospital, a medical center, or a research institute that is affiliated with an institution of higher education.
- Specific to grants awarded by the NSF, a Significant Financial Interest also does not include:
 - an equity interest that, when aggregated for the investigator and the investigator’s spouse and dependent children, meets both of the following tests: does not exceed \$10,000 in value as determined through reference to public prices or other reasonable measures of fair market value, and does not represent more than a 5% ownership interest in any single entity; or
 - salary, royalties, or other payments that, when aggregated for the investigator and the investigator’s spouse and dependent children, are not expected to exceed \$10,000 during the prior twelve-month period.

 Route form to Grant Manager at grants@pugetsound.edu

Administrative Review and Approval

The Provost, Grant Manager, and/or other institutional designees serve as the individual(s) appointed by the university to solicit and review disclosures of Significant Financial Interests from each Investigator.

If No Significant Financial Interest Reported:

- No activity is reported and, to the best of my knowledge, no conflict of interest exists.

If Any Significant Financial Interest is Reported:

Based on the activity reported and, to the best of my knowledge and in my judgment:

- No conflict of interest exists.
- A conflict of interest may exist that warrants further review. If it is determined that a conflict of interest does exist, action will be taken to manage, reduce or eliminate such conflict of interest and the appropriate notifications, if applicable, will be provided to the sponsoring agency.

Electronic Signature—Grant Manager [Click or tap here to enter text.](#)

Date [Click or tap to enter a date.](#)

Electronic Signature—Provost [Click or tap here to enter text.](#)

Date [Click or tap to enter a date.](#)