



SIGNIFICANT FINANCIAL INTEREST (SFI) DISCLOSURE FORM

In compliance with the Bradley University's Financial Conflict of Interest Policy, this form must be completed by all Bradley University Investigators ("Investigator") who receive or intend to seek funding from external entities. **This completed form is considered CONFIDENTIAL**, and must be submitted directly to the Office of Sponsored Programs ("OSP"). **DO NOT** include this form with other materials that are routed for review by department chairs, college deans, etc. This form will be kept in a locked file in OSP, and a copy will be kept in a locked file in the Provost's Office.

Employee Full Name (Last, First, MI): _____

Position Title: _____

University Contract Period: (check all that apply): _____ % Appointment: _____

Summer Fall Spring 9 month 10 month 12 month

Department/Unit: _____ College/Division: _____

Section I: All Bradley University Investigators who seek external funding must:

- Complete the CITI Conflict of Interest (COI) Course under a Bradley University Learner Group and submit the Completion Certificate to OSP prior to the submission of a request for funding from an external entity (bradley.edu/academic/cio/osp/research-integrity/conflict-of-interest/).
- Re-take the CITI course and submit a Completion Certificate to OSP at least once every **four years** after their initial completion of the CITI COI course modules.
- Submit an SFI form (this form) to OSP prior to the submission of a request for external funding and then **at least once annually** when seeking or receiving external funding.
- Submit an updated SFI form to OSP within thirty (30) days a revised SFI form when a new SFI is discovered or acquired or when changes occur to previously disclosed SFIs.
- Cooperate with any actions that may be undertaken to identify and manage financial conflicts of interest when the potential for a conflict of interest is identified in regards to a specific initiative or activity being proposed to an external entity for funding support.

Section II: Definitions and Guidelines

Investigator: *"the project director or principal Investigator and any other person, regardless of title or position, who is responsible for the design, conduct, or reporting of"*¹ both active or proposed externally-funded projects. Examples of other persons, include, but is not limited to co-investigators, co-directors, collaborators, consultants, and subgrantees.

Institutional Responsibilities: *"an Investigator's professional responsibilities on behalf of the Institution, and as defined by the Institution in its policy on financial conflicts of interest, which may include for example: activities such as research, research consultation, teaching, professional practice, institutional committee memberships, and service on panels such as Institutional Review Boards or Data and Safety Monitoring Boards."*¹

Significant Financial Interest ("SFI"): *"Consisting of one or more of the following interests of the investigator (and those of the investigator's spouse and dependent children) that reasonably appears to be related to the Investigator's institutional responsibilities"*¹ in the 12 months prior to disclosure including:

- Remuneration from an outside entity exceeding \$5,000
- ANY equity interest in a non-publicly traded entity
- Equity interests in publicly traded entities exceeding a value of \$5,000
- Intellectual property rights exceeding \$5,000
- Reimbursed travel expenditures from a single entity exceeding \$5,000

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.
- Unlicensed intellectual property that does not generate income OR that is owned/administered through BU
- 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/project director does not directly control the investment decisions made in these vehicles. (For example, do not disclose TIAA-CREF retirement accounts)

1) ecfr.gov/current/title-42/chapter-I/subchapter-D/part-50/subpart-F

Section III. Disclosure: Each Investigator, who seeks external funding, must respond to each of the five questions below. Disclose any interests indicated that relate to the Investigator’s institutional responsibilities and those of the Investigator’s spouse and dependent children and were received in the 12 months prior to the date of completing this disclosure form. If a response to any question is “YES,” the detail requested is required. Attach additional copies as needed.

1. In the past 12 months, have you received remuneration from an entity that, when aggregated, totals more than \$5,000? **RESPONSE:**
 Yes No

Entity #1 Name: _____

Last Date of Remuneration: _____ Aggregate Amount of Remuneration: _____

REASON for Remuneration:

Entity #2 Name: _____

Last Date of Remuneration: _____ Aggregate Amount of Remuneration: _____

REASON for Remuneration:

2. Do you hold ANY equity interest in a non-publicly traded entity? **RESPONSE:**
 Yes No

Entity #1 Name: _____

Last Date of Remuneration: _____ Aggregate Amount of Remuneration: _____

REASON for Remuneration:

Entity #2 Name: _____

Last Date of Remuneration: _____ Aggregate Amount of Remuneration: _____

REASON for Remuneration:

3. Do you hold equity in a publicly-traded entity valued at more than \$5,000?

RESPONSE:
 Yes No

Entity #1 Name: _____

Last Date of Remuneration: _____ Aggregate Amount of Remuneration: _____

REASON for Remuneration:

Entity #2 Name: _____

Last Date of Remuneration: _____ Aggregate Amount of Remuneration: _____

REASON for Remuneration:

4. Do you have any intellectual property rights that are NOT owned/administered by Bradley University from which you receive income that exceeds \$5,000 in the past 12 months?

RESPONSE:
 Yes No

Entity #1 Name: _____

Last Date of Remuneration: _____ Aggregate Amount of Remuneration: _____

REASON for Remuneration:

Entity #2 Name: _____

Last Date of Remuneration: _____ Aggregate Amount of Remuneration: _____

REASON for Remuneration:

5. Have you received sponsored or reimbursed travel from any entity that, when aggregated, totals more than \$5,000 in the previous 12 months? **RESPONSE:**
 Yes No

Entity #1 Name: _____

Last Date of Remuneration: _____ Aggregate Amount of Remuneration: _____

REASON for Remuneration:

Entity #2 Name: _____

Last Date of Remuneration: _____ Aggregate Amount of Remuneration: _____

REASON for Remuneration:

Section IV. Employee Certification

I affirm:

- I hereby adhere to and comply with Bradley University’s Sponsored Programs Significant Financial Interest Policy;
- I have submitted certification to the Office of Sponsored Programs within the last four years confirming that I have reviewed and understand the training I received from the CITI Conflict of Interest Course
- The information I have provided in this Form is complete and accurate to the best of my knowledge; and
- I understand that I will disclose all new Significant Financial Interests (SFI) related to my Institutional Responsibilities to the Office of Sponsored Programs within thirty (30) days of identifying a new SFI.

Signature: _____ Date: _____

Resources:

- [CITI Conflict of Interest Training Modules](#)
- [Bradley University’s Financial Conflict of Interest Policy](#)
- [Bradley University Office of Sponsored Programs Contacts](#)