

# Conflict of interest disclosure form

Applicable for SDU faculty or staff involved in research funded fully or in part by awards or subawards issued from NIH or other U.S. Public Health Services research granting agencies

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## Purpose

This form was designed to satisfy the disclosure requirements mandated by the Federal Public Health Service (PHS) regulations (42 CFR Part 50 and 45 CFR Part 94) on Promoting Objectivity in Research. This disclosure should reflect those significant financial interests that are related to your organizational responsibilities at SDU.

## Should you fill out this form?

You should fill out this form only if you as SDU faculty or staff are involved in research funded fully or in part by NIH or other PHS research funding agencies.

Please note that you should only report significant financial interests that relate to your academic or professional work at SDU.

For more information, please see the list of definitions at the following page.

## All amounts in US Dollars

Please state all amounts in this form in US Dollars.

## Questions and comments

Please contact SDU's FCOI office at [fcoi@sdu.dk](mailto:fcoi@sdu.dk)

## Definitions

- **Entity:** Any non-SDU, domestic or foreign, public or private, organization (excluding a Danish or U.S. federal agency) from which you or your spouse or dependent children receive remuneration or have an ownership or equity interest.
- **Equity:** Any stock, stock option, or other ownership interest, whether or not the value can be determined through reference to public prices or other reasonable measures of fair market value.
- **Remuneration:** Any payment received from an outside entity in any form, including, but not limited to, stocks, bonds, stock options, warrants, partnership interests, rights to patent or royalty payments, consulting fees, honoraria, speaking fees, salary, loans, lectureship fees, or fees for serving on boards of directors, scientific and other advisory boards.
- **Significant Financial Interest:** Anything of monetary value that meets any of the following criteria (when combined for you, your spouse and /or your dependent children):
  - Income >\$5,000 (U.S. dollars) past 12 months
  - As of the date of disclosure, any combination of income + equity in a publicly traded company >\$5,000 (U.S. dollars)
  - Any equity interest in a non-publicly traded company
  - For you only: Third party reimbursed or sponsored travel in any amount for any travel related to your organizational responsibilities for SDU
  - Income >\$5,000 (U.S. dollars) from intellectual property not assigned to SDU
- **Non-Reportable Interests include:**
  - Financial interests or activities that do not relate to your academic or professional work at SDU
  - Salary support received through SDU or salary support through SDU administered sponsored awards
  - Income from investment vehicles, such as mutual funds and retirement accounts, as long as you do not directly control the investment decisions made in these vehicles
  - Travel expenses paid by SDU or by a sponsored research award to SDU
  - Income from seminars, lectures and teaching engagements sponsored by Danish or U.S. federal, state, local or other national government agencies institutions of higher education or research institutes academic teaching hospitals or medical centers that are affiliated with institutions of higher education
  - Income from service on advisory committees or review panels for Danish or U.S. federal, state, local or other national government agencies institutions of higher education or research institutes academic teaching hospitals or medical centers that are affiliated with institutions of higher education
  - Compensated activities and income derived from Danish or U.S. government or non-profit research entities

**Section 1: Personal information****Name**

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**Position/title**

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**SDU affiliation (faculty, department)**

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**Involvement in NIH/PHS funded research at SDU**

Please list the NIH/PHS funded research you are involved in at SDU. Please include the project title, the name of the funding agency (e.g., NIH), and the planned start and end dates of the project.


**Type of disclosure**

Please indicate the type of this disclosure

- ☐ Initial disclosure
- ☐ Addendum to my most recent disclosure
- ☐ Annual disclosure
- ☐ Addendum for travel purposes only to my most recent disclosure

## Section 2: Significant financial interests in Publicly Traded Entities

In accordance with PHS regulations, a significant financial interest exists if the value of any remuneration received from any 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.

**A: During the past 12 months, did you, your spouse or your dependent children receive remuneration such as consulting fees, honoraria, speaker fees, advisory board fees from any publicly traded entity that, when combined, amounted to greater than \$5,000?**

Because PHS regulations do not exclude income from authorship activities, you must include them in your response to this question. Please do not include equity, royalties or other payments on intellectual property rights in your response to this question.

No ☐

Yes ☐ If yes, please fill out the table below

Name of Entity	Type of business	Activity	Amount	You/spouse/child

**B: As of the date of this disclosure, do you, your spouse or your dependent children hold any equity interests in a publicly traded entity? If so, does the value of this equity exceed \$5,000 (U.S. dollars) either on its own or when combined with any other remuneration from the same entity?**

No ☐

Yes ☐ If yes, please fill out the table below

Name of Entity	Type of business	Type of equity	Amount	You/spouse/child

**Section 3: Significant financial interests in non-publicly traded entities**

According to PHS regulations, a significant financial interest exists if the value of any remuneration received from any non-publicly traded entity in the twelve months preceding the disclosure, when aggregated, exceeds \$5,000 (in U.S. dollars), or when you (or your spouse or dependent children) holds any equity interest in the same entity.

For purposes of the PHS regulations and this question, remuneration includes salary and any payment for services not otherwise identified as salary (e.g., consulting fees, honoraria, paid authorship). Equity interests include stock, stock options, or other ownership interests.

**A: During the past 12 months, did you, your spouse or your dependent children receive any remuneration from ANY non-publicly traded entity that when combined amounted to greater than \$5,000 U.S. dollars?**

Because PHS regulations do not exclude income from authorship activities, you must include them in your response to this question. Please do not include royalties or other payments on intellectual property rights in your response to this question.

No ☐

Yes ☐ If yes, please fill out the table below

Name of Entity	Type of business	Activity	Amount	You/spouse/child

**B: During the past 12 months, did you, your spouse or your dependent children hold any equity interests in any non-publicly traded entity?**

No ☐

Yes ☐ If yes, please fill out the table below

Name of Entity	Type of business	Type of equity	Amount	You/spouse/child

**Section 4: Significant financial interests in non-profit entities**

**A: During the past 12 months, did you, your spouse or your dependent children receive any remuneration from a non-profit entity that when combined amounted to greater than \$5,000 U.S. dollars?**

Because PHS regulations do not exclude income for authorship activities or income from external professional organizations, you must include them in your response to this question. Also in accordance with PHS regulations, you must include income from a foreign institution of higher education or the government of another country in your response to this question.

**Do not include the following:**

- Income from seminars, lectures and teaching engagements sponsored by Danish or U.S. federal, state, local or other national government agencies institutions of higher education or research institutes academic teaching hospitals or medical centers that are affiliated with institutions of higher education
- Income from service on advisory committees or review panels for Danish or U.S. federal, state, local or other national government agencies institutions of higher education or research institutes academic teaching hospitals and medical centers that are affiliated with institutions of higher education and
- Royalties or other payments on intellectual property rights in your response to this question.

No ☐

Yes ☐ If yes, please fill out the table below

Name of Entity	Activity	Amount	You/spouse/child

**Section 5: Significant financial interests in non-profit entities**

**A: During the past 12 months did you, your spouse, or your dependent children have any income greater than \$5,000 for intellectual property rights (e.g., patents, patent applications, license agreements, or copyrights) resulting from or related to your work at SDU?**

**Do not include the following:**

- Payments from or intellectual property owned by SDU

No ☐

Yes ☐ If yes, please fill out the table below

Short description of invention	Licensed/patented/pat. Pending?	If receiving royalties/other payments greater than \$5,000, indicate the name of the entity providing the royalty/payment.	You/spouse/child

## Section 6: Travels paid for by third party

**A: During the past 12 months, did you have a third party pay for your travel that is related to your responsibilities at University of Southern Denmark?**

For the purposes of this disclosure, travel costs include meals, transportation, lodging, and registration fees.

Third party paid travel means:

- Third party directly pays in whole or in part for travel on your behalf
- You pay for travel and third party reimburses you in whole or in part
- University of Southern Denmark pays in whole or in part for travel and the third party reimburses SDU PHS regulations

Include travel paid by:

- For profit entities
- Non-profit entities including external professional organizations and societies
- Academic journals and publishing companies
- any travel reimbursed or sponsored by a foreign institution of higher education or the government of another country.
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Do not include travel paid by:

- Subrecipient organization
- Danish and U.S. federal, state or local government agencies
- Institutions of higher education or research institutes
- Academic teaching hospitals or medical centers that are affiliated with Institutions of higher education.
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No ☐

Yes ☐ If yes, please fill out the table below

Destination	Duration of trip	Purpose	Estimated value (USD)	Who paid for the travel



## Section 7: Certification

I certify that I have read and understand SDU's Financial Interest Disclosure Policy and have completed this Disclosure to the best of my knowledge and belief. Further, as someone who is identified as an investigator on a PHS proposal/award, subaward, or non-federal sponsor adopting the Public Health Services (PHS) regulations, I agree to comply with PHS regulatory requirements adopted as SDU's policy as well as acknowledge the following:

- No later than at the time of proposal/application I will ensure that a current financial interest disclosure is on file
- I will fulfill my disclose responsibilities at least annually or within 30 days of discovering or acquiring (e.g., through purchase, marriage, or inheritance) a new SFI during the period of the award whichever comes first, including the occurrence of any reimbursed or sponsored travel which is paid on my behalf, related to my responsibilities at SDU
- If I fail to report a new SFI within 30 days, I will willingly participate in the required retrospective review of my research in order to determine bias
- With the decisions of the FCOI Board reflected in a management plan, if one is issued
- If I am a PI, I will appropriately identify individuals (i.e., "investigators") if any, in my proposal, who are responsible for the conduct, design, or reporting of the research. I will take into consideration the role of the investigator, rather than their title and the degree of independence with which the investigator will work
- If I am a PI, I will complete my progress report in a timely fashion to assist the PHS Grantee in its reporting requirements related to any identified and previously reported FCOIs
- That SDU must comply with written requests for information regarding my reported FCOIs. SDU's response must be within 5 business days and will include:
  - My name
  - My title and role with respect to the research project
  - The name of the entity in which the significant financial interest is held
  - The nature of the significant financial interest and
  - The approximate dollar value of the significant financial interest will be provided in the following dollar ranges: \$0–\$4,999; \$5,000–\$9,999; \$5,000–\$19,999; amounts between \$20,000–\$100,000 by increments of \$20,000; amounts above \$100,000 by increments of \$50,000, or a statement that the interest is one whose value cannot be readily determined through reference to public prices or other reasonable measures of fair market value and
- That SDU may impose sanctions on me if I fail to comply with the PHS regulations and SDU's policy.

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Full name	Date	Signature
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