

**EMORY UNIVERSITY**  
**EXTERNAL PERSONNEL REPORT OF FINANCIAL INTERESTS IN RESEARCH**  
**AWARDS AND CONTRACTS FOLLOWING US Public Health Services [PHS] REGULATIONS**

**WHO MUST COMPLETE THIS FORM?**

At a minimum, an *External Investigator Report of Financial Interests in Research* must be provided for **External Personnel** who meet the following criteria:

- Project Directors, Principal Investigators, and/or members of the research team identified as Senior or Key Personnel on the grant or contract application, progress report, or any other report;
- Individuals identified by the Principal Investigator or Project Director who are responsible for and have substantial independent decision making in respect to the design, conduct or reporting of the research, such as Collaborators or Consultants named on the grant;
- The **External Investigator** must report Significant Financial Interests for himself /herself and for his/her spouse, same sex domestic partner and dependent children that are related to the Investigator's institutional responsibilities;
- Visiting scholars or students (Visitors) hosted by any school or unit of Emory University per [Policy for Visiting Scholars and Students \(7.12\)](#)

**WHY MUST THIS FORM BE COMPLETED?**

In situations where Emory is the primary awardee of a PHS funded grant and/or recipient of other sponsored funding adhering to PHS regulations, Emory is responsible for monitoring and, if a financial conflict of interest is found, reporting the significant financial interests of ALL Key Personnel named on the grant, including subrecipients, external consultants/collaborators who are listed as Senior or Key Personnel, etc. If the subawardee institution indicates on the consortium letter that they do not have a policy that is in compliance with the 2011 revised federal regulation on Financial Conflict of Interest at [42 CFR Part 50 Subpart F](#), then the Investigators named on the subaward must complete this form.

**WHEN TO DISCLOSE?**

- BEFORE the proposal is submitted (All research applications need to have an up-to-date disclosure on file. Grant proposals will not be submitted if the disclosure profile is not completed and/or updated);
- At the time of the Annual Certification period; and
- Within 30 days of learning of a new financial interest related to a grant;
- Prior to a Visitor's arrival at Emory

The original *External Investigator Report of Financial Interests in Research* form must be submitted with the proposal to the Office of Sponsored Programs. One copy should be retained with the principal investigator's records relating to the project.

**WHERE DOES THIS FORM GO?**

You will submit this form to the Research Administrator of Emory's PI. S/he will submit the form to the Office of Sponsored Programs (OSP) through the Emory Proposal Express System. Upon review of this form, if the OSP Analyst

finds that **ANY** of the Significant Financial Interests are checked, this form will be forwarded to the COI Review Office at the following email address: [eDisclose@emory.edu](mailto:eDisclose@emory.edu)

A member of the COI Review Office might contact you for additional information.

## **EXTERNAL INVESTIGATOR REPORT OF FINANCIAL INTERESTS IN RESEARCH**

**Grant Title:**

**Subrecipient Organization:**

**Grant/Proposal Number (if available):**

**Emory PI/PD Name:**

### **Section I: Personal Information**

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**External Investigator Name:**

**Phone Number:**

**Email:**

**Your role in the study:**

Study Site Key Personnel

Visiting Student or Scholar

Other (specify): \_\_\_\_\_

## Section II: Significant Interest Disclosure

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Check all financial interests related to your institutional responsibilities (i.e., teaching, research, clinical or administrative duties) that apply to you (including immediate family, individually or in aggregate).

**Check Boxes– You MUST check at least one.**

- ☐ Payments of \$5,000 or more including salary, consulting fees, royalty or licensing payments from intellectual property, honoraria and/or gifts received within the past 12 months or anticipated over the next 12 months (excluding salary, grant support, and other payments for services from Emory University or your home institution);
- ☐ Equity or ownership interest (includes stock options) valued at \$5,000 or more as determined by reference to its publicly listed price (excluding mutual funds);
- ☐ Any equity or ownership interest, if the value cannot be determined by reference to publicly listed prices (privately held companies, for example, start-up companies);
- ☐ A position as director, officer, partner, trustee, employee, or any other position of management;
- ☐ Any intellectual property ownership, licensing fees, and/or royalties, including royalties under any royalty-sharing agreements involving Emory University or your home institution;
- ☐ Any combination of remuneration, fees, royalties, or honoraria, which exceeds \$5,000 when aggregated, received within the past 12 months or anticipated for the next 12 months, from an entity whose products or services are used or studied in the research or who are developing products or services that the research is intended to study or evaluate; or
- ☐ Any compensation whose value could be affected by the outcome of the research.
- ☐ Any reimbursed or sponsored travel, **not including** travel that is reimbursed or sponsored by (1) a federal, state, or local government agency; (2) an Institution of higher education; (3) an academic teaching hospital; (4) a medical center; or (5) a research institute affiliated with an Institution of higher education.
- ☐ None of the above.

If you have selected any items above that indicate a financial interest please provide information about the item(s) you have selected below. For instance, what entity the selected answer(s) corresponds to and any other clarifying information:

**Certification:**

**I certify that:**

1. All **Significant Financial Interests** meeting the criteria above have been disclosed.
2. If I am the Principal Investigator, I have obtained and submitted disclosures for all members of the research team meeting the definition of “Investigator” as defined herein.
3. I am aware and understand that I have an ongoing responsibility to update my report immediately upon any change in outside financial activities that are related to this research project. Additionally, if I am Principal Investigator for this research project, I understand that it is my responsibility to ensure that the other members of the research team update their disclosures on an ongoing basis as their circumstances change.
4. I have completed the NIH Office of Extramural Research Financial Conflict of Interest tutorial available at: <http://grants.nih.gov/grants/policy/coi/tutorial2011/fcoi.htm>
5. I have read and understand Emory University policies regarding conflict-of-interest disclosure, including the below:
  - [Emory Statement of Guiding Ethical Principles](#);
  - [Financial Conflicts of Interest in Research](#);
  - [Policy for Visiting Scholars and Students \(7.12\)](#) if applicable.

\_\_\_\_\_  
**Investigator Signature\***

\_\_\_\_\_  
**Date**

**External Investigator Name:** \_\_\_\_\_

\* No “per” signatures or stamps will be accepted

## DEFINITIONS YOU NEED TO KNOW TO COMPLETE THIS FORM:

**KEY PERSONNEL:** Key Personnel is, at minimum, the Project Directors, Principal Investigators, members of the research team identified as senior/key personnel on the grant or contract application, progress report, or any other report. In addition, individuals identified by the Project Director or Principal Investigator who are responsible for and have substantial independent decision making in respect to the design, conduct or reporting of the research, such as Collaborators or Consultants named on the grant.

**COMPENSATION:** **Compensation** means anything of monetary value including, but not limited to, salary, consulting fees, honoraria, items of value (i.e.; a watch or tickets), or other payments for services of any type, including speaking, teaching, and educational engagements, as well as gifts to an **Investigator**.

**INSTITUTIONAL RESPONSIBILITIES:** means those activities related to a Key Personnel Research, Teaching, Clinical, Administrative or Professional Duties

**SIGNIFICANT FINANCIAL INTEREST:** A **Significant Financial Interest (SFI)** means having one or more Financial Interests held by a Covered Individual or Covered Family Member that meet the following thresholds:

- Remuneration or honoraria or gifts (i.e.; cash, equipment, or anything else of value) worth \$5,000 or more from a single entity within a 12-month period
- Ownership interests (e.g., stock, stock options, dividends, equity) valued \$5,000 or more
- Any intellectual property ownership, licensing fees, and/or royalties
- Any ownership interest (e.g., stock, stock options, dividends, equity) in a privately held entity (i.e., start-up companies, LLCs)
- Holding any management or fiduciary position (e.g., director, officer, trustee, management employee, etc.) in a non-Emory entity
- Travel valued \$5,000 or more paid by directly to or on behalf of the Covered Individual by an external entity

The following items are **NOT** considered to be a Significant Financial Interest:

- Salary, royalties, or other payments for services from Emory University
- Certain income received from certain activities such as “seminars, lectures, or teaching engagements” and “service on advisory committees or review panels” from a federal, state, or local government agency located in the United States, a United States 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 a United States Institution of higher education.
- Income from investments where individual does not control the investment vehicle (e.g., mutual funds, retirement accounts)
- Gifts to Emory University where the Investigator has no signing authority for the Emory account.
- Travel paid by Emory or travel reimbursed or sponsored by U.S. federal, state, or local government, U.S. institute of higher education, U.S. academic teaching hospital, U.S. medical center, U.S. Research institute that is affiliated with a U.S. institute of higher education