

**Occidental College Sponsored Research Office
Financial Disclosure Cover Sheet**

Completion of this form is required of all Investigators on research proposals to and awards from the federal government (applicable to both direct and pass-through funding). Federal Regulations (42 CFR Part 50 and 45 CFR Part 94) require a complete disclosure of all significant financial interests that appear related to the Investigators' institutional responsibilities (1) prior to proposal submission, (2) as those interests change, and (3) on an annual basis during the project award period. Should it be determined that a financial conflict of interest exists, the information may be released to the funding agency. It is the Principal Investigator's responsibility to gather financial disclosure information and signatures from the other Investigators on the project. See At a Glance: Occidental College Financial Conflict of Interest Policy below for definitions of "Significant Financial Interest", "Investigator", and other terms. 12/2/2016

Principal Investigator Name: _____ Department: _____

Project Dates: _____ Proposal/Award Title: _____

Sponsor:

PHS/NIH NSF OTHER _____

Subcontract of federal agency; funds from:

This submission is for (check one):

Proposal

Annual Reporting

Change in Investigator(s)

A. Principal Investigator(PI): By signing below, the PI certifies that: (1) The PI understands Occidental's Financial Conflict of Interest policy (see attached summary); (2) This form provides a complete disclosure of PI's significant financial interests related to this project; and (3) This form provides equivalent disclosures from all other Occidental Investigators associated with this project.

Do you, your spouse or dependent children have any "significant financial interests" (as defined by the Financial Conflict of Interest Policy) related to your institutional responsibilities?

No Yes, Financial Disclosure Form is attached in a sealed envelope. (Please type or print information.)

Print Name and Title of Principal Investigator

Signature of Investigator

Date

B. Occidental Investigators: By signing below, you certify that you understand Occidental's Financial Conflict of Interest policy (see attached summary) and that this form provides a complete disclosure of your significant financial interests related to this project. Do you, your spouse or dependent children have any "significant financial interests" (as defined by the Financial Conflict of Interest Policy) related to your institutional responsibilities?

1. No Yes, Financial Disclosure Form is attached in a sealed envelope. (Please type or print information.)

Print Name of Investigator

Signature

Date

2. No Yes, Financial Disclosure Form is attached in a sealed envelope. (Please type or print information.)

Print Name of Investigator

Signature

Date

3. No Yes, Financial Disclosure Form is attached in a sealed envelope. (Please type or print information.)

Print Name of Investigator

Signature

Date

C. Subrecipients: Does this project include a subaward? No Yes

If yes: Provide a written agreement with each subrecipient that specifies whether Occidental's FCOI policy, or that of the subrecipient's institution, will apply to subrecipient Investigators. Occidental must be assured that the subrecipient's institution has policies that comply with the funding agency's regulations.

At a Glance: Occidental College's Financial Conflict of Interest Policy

Attach Additional sheets as required to identify and include financial disclosure forms for all project investigators.

At a Glance: Occidental College Financial Conflict of Interest Policy

In order to ensure appropriate management of actual or potential financial conflicts of interest, the federal government requires that each investigator on a federally-funded research project disclose all significant financial interests that appear to be related to the investigator's institutional responsibilities, including all research, teaching and service to the College.

The term "**investigator**" includes all senior personnel (PIs, co-PIs, faculty associates) plus any others "responsible for the design, conduct, or reporting of the research."

In the context of this policy, a "**significant financial interest**" means one or more of the following interests, *if it reasonably appears to be related to the Investigator's institutional responsibilities, including research, teaching, and service to the College*

- Remuneration or equity interest in a publicly traded entity that totals more than **\$5,000** for the twelve months preceding the disclosure
- Remuneration exceeding **\$5,000** or **any equity interest** in a non-publicly traded entity over the previous 12 months
- income related to intellectual property rights (e.g., patents or copyrights) exceeding **\$5,000** over the previous 12 months.

In the context of this policy, the term "significant financial interest" does **NOT** include:

- Salary, royalties, or other remuneration from Occidental College
- Income from most mutual funds or retirement accounts
- Income from seminars, lectures, or teaching engagements
- Income from service on advisory committees or review panels

An investigator must disclose any significant financial interest that appears related to the investigator's institutional responsibilities, including all research, teaching and service to the College:

- With the **Request for Proposal and Submission (RPAS) form**, before the proposal is submitted;
- And within thirty (30) days of discovering or acquiring (e.g., through purchase, marriage or inheritance) any **new significant financial interest**;
- And via the **annual collection of financial disclosures** conducted by the Occidental College Undergraduate Research Center.

A "**financial conflict of interest**" exists when an investigator's significant financial interest (or that of the investigator's spouse, partner, or dependent children) could significantly affect the design, conduct, or reporting of federally-funded research.

What happens to financial disclosures that are submitted? The Associate Dean for Research or the Dean of the College's designee, in consultation with the Dean of the College, will review each financial disclosure, determine whether a financial conflict of interest exists, and establish what conditions or restrictions, if any, should be imposed by Occidental College to manage, reduce, or eliminate such conflicts of interest. See the full policy at <http://www.oxy.edu/sro> for additional details.