

HARVARD UNIVERSITY FINANCIAL INTEREST DISCLOSURE FORM

(For Non-Harvard Medical School-Affiliated Individuals)

This form is intended for use by Harvard-affiliated individuals without an active HUID. If you have an active HUID, please use the electronic version of this form at <http://fcoi.harvard.edu>. Separate guidance is available at <https://ari.hms.harvard.edu/> for Harvard Medical School-affiliated individuals. If you are a non-Harvard sub-awardee on a project sponsored by agencies of the US Public Health Service, please contact a [COI Officer](#) before completing this form.

All members of the Harvard community share a commitment to uphold the University's core missions and values. Among these missions and values are assurance of personal and institutional integrity in the conduct of all academic duties; pursuit and communication of truth; independent, objective, and ethical scholarship and research; accountability for actions and conduct; and, preservation of the University's standing as an institution worthy of public confidence and trust.

In seeking to uphold the highest standards of integrity and maintain the reputation of all faculty members and the University, Harvard has enacted a [Policy](#) on Individual Financial Conflicts of Interest for Persons Holding Faculty and Teaching Appointments, and Procedures specific to the implementation of the August 25, 2011 Public Health Service Rule. In accordance with the Policy, complete the following brief disclosure of your financial interests to the best of your knowledge. All disclosures will be held in strict confidence. While you are engaged in a project funded by the NSF or any of the agencies that follow the PHS rules for FCOI (42 CFR 50, Subpart F), training is also required once every four years. That training is posted online at https://vpr.harvard.edu/files/ovpr-test/files/fcoi.harvard.edu_training_pdf, and a certification to having completed that training is included at the end of this form.

If you require guidance regarding how to complete this form, please contact the [COI Officer](#) in the Harvard School with which you are affiliated.

SECTION A

First Name: Last Name: Middle Initial:

Phone Number: Email Address:

School / Department:

- 1) Is this an 'annual disclosure'? (Select 'no' if this is an interim update) Yes No
- 2) Do you receive, or are you planning to apply for funding from the National Science Foundation, US Public Health Service or any of the other agencies listed online at http://sites.nationalacademies.org/PGA/fdp/PGA_070596? Yes No

SECTION B

- 3) Do you have any **significant financial interests**? (*See Appendix A for definitions*). Yes No

Please answer 'yes' if in the past twelve months, you (including **family members**) had a financial interest (including compensation) in a **related outside entity** of more than \$5,000 in total and when aggregated by entity, or, if you or a **family member** currently hold **equity** of any amount in a privately-held for-profit **related** outside entity.

If yes, please complete **Section C** of this form for each entity in which you have a **significant financial interest**.

- 4) Have you – or a **family member** – served in a **fiduciary or management role** for a **related outside entity** in the past twelve months? Yes No

If yes, please complete **Section C** of this form for each entity in which you have a **fiduciary or management role**.

- 5) Do you hold any patents, patent applications, or other interest in intellectual property (e.g. license agreements), in anticipation of deriving future financial benefit from them? Yes No

If yes, please briefly describe the nature of the intellectual property interests you hold.

SECTION C

*Interests in Companies and Other Entities Related to your Research, Teaching and other **Institutional Responsibilities***

- Please complete this section for each of the entities in which you have an interest, one entity per copy, making as many additional copies as needed.
- Only disclose the interests in entities that relate to your research, teaching or other **Institutional Responsibilities**.
- Do not disclose income from investment vehicles, such as mutual funds and retirement accounts, where you do not directly control the investment decisions made in these vehicles.
- Please review the full definition of **related outside entity** in Appendix A.

1) Total number of **related outside entities** in which you have a **significant financial interest**:

2) **Name of RELATED ENTITY** (one entity per copy):

3) Is this a for-profit entity? Yes No

If yes, is the entity publicly traded? Yes No

4) I, or a **family member**, have received salary, consulting fees, honoraria, gifts or other benefits, "in kind" compensation, reimbursements in excess of reasonable costs, or other remuneration from this entity in the past twelve months. Yes No

If yes, please indicate the aggregate dollar amount of your (and any family members) compensation received from this entity in the last twelve months.

5) I, or a **family member**, hold **equity** (including stock, stock options, or other ownership) interests in this entity. Yes No

If yes, please indicate the aggregate dollar value of your (and any family members) **equity** interests in this entity.

6) I, or a **family member**, have received royalties, license fees, or similar payments from intellectual property rights from this entity in the last twelve months. Yes No

If yes, please indicate the aggregate dollar value of your (and any family members) intellectual property related payments from this entity in the last twelve months.

7) Does this entity own, license, market or sell a product or technology that you research as part of your **institutional responsibilities**? Yes No

If "yes", please describe the product or technology and how it relates to your research.

8) I, or a **family member**, had a **fiduciary or management role** with this entity in the past twelve months. Yes No

If yes, please state which family member(s) holds the interest identified above (e.g. self, spouse, dependent child), and the type of position held.

9) Does this entity relate to research for which you receive funding from the National Science Foundation, US Public Health Service or any of the other agencies listed online at http://sites.nationalacademies.org/PGA/fdp/PGA_070596?

Yes No

If **yes**, please briefly describe.

If **no**, please briefly describe the relationship between this entity and any other research, teaching or University- related activity in which you are involved (e.g., the entity sponsors your research or could benefit from the findings of your research.)

10) Does this entity relate to Harvard research where you are listed as study staff on the IRB protocol (either Harvard University Area (Cambridge/Allston campuses) or Longwood Medical Area (HSPH, HMS, and HSDM)?)

Yes No

If "yes": (a) please provide the ESTR IRB number(s) (preferred) or PI name and title(s) of the project(s); and (b) describe the relationship.

SECTION D

Please use this space to provide any additional information that you believe may relate to your disclosure

ASSURANCE

By signing below, I assure that:

- a. I have reviewed the University's [Policy](#) on Individual Financial Conflicts of Interest for Persons Holding Faculty and Teaching Appointments, and Procedures specific to the implementation of the August 25, 2011 Public Health Service Rule, and my School's implementation plan;
- b. If engaged in a project funded by the NSF or [a sponsor that follows the PHS rules for FCOI](#) (at 42 CFR 50, Subpart F) and not already completed in the past four years, I have completed the training by carefully reviewing the information posted at https://vpr.harvard.edu/files/ovpr-test/files/fcoi.harvard.edu_training_pdf;
- c. That the information provided herein is true and complete to the best of my knowledge; and,
- d. That by completing this form I am in compliance with the disclosure requirements of the University and my School.

SIGNATURE

DATE

APPENDIX A: Definitions of Key fCOI Terms (Last Updated: April 19, 2012)

Equity means stock, stock options, warrants or other ownership interest. You are not required to disclose equity held in diversified financial holdings such as mutual funds.

Family Member means spouse and dependent children. So far as the financial interests of family members bear upon the application of the University policy on financial conflicts of interest, a faculty member must affirmatively make inquiry into, and shall be presumed to know of, the financial interests of family members as herein defined.

Fiduciary or Management Role means service as an officer, director or service on an advisory board (including scientific advisory boards), whether paid or unpaid. Investigators may need prior approval from the Dean before assuming such responsibilities. "Fiduciary or management role" does not mean service on an editorial board. In their implementation plans, schools may extend this requirement to include service on the board or advisory panel of a not for profit entity.

Institutional Responsibilities means an individual's professional responsibilities on behalf of Harvard. Such responsibilities include, but are not limited to: research, research consultation, teaching, professional practice, institutional committee memberships, and service on committees or panels such as research ethics committees (e.g. Institutional Review Boards, Institutional Animal Care and Use Committees) and other bodies monitoring the conduct of research.

Investigator means 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 research

Related Outside Entity means an entity in which a person has a significant financial interest that may, or may reasonably appear to an outside observer, to influence the discharge of teaching, research, or other University-related responsibilities. In determining relatedness, individuals should employ a standard of common sense, and when in doubt, disclose. Examples of entities that might be related are those:

- (1) whose products, services or activities are related to the areas of a faculty member's or an investigator's teaching or research;
- (2) that fund research in a faculty member's or an investigator's area of academic interest;
- (3) that own or have rights to develop intellectual property that is the subject of research in which a faculty member or an investigator participates;
- (4) that compete commercially with such an entity as described in (3);
- (5) that make or propose to make a gift to the University that would support a faculty member's or an investigator's teaching or research activities;
- (6) that furnish products or services to the University through a contractual process in which a faculty member or an investigator participates in any way;
- (7) that propose to enter a licensing agreement with the University with respect to technology invented by the faculty member or investigator;
- (8) that act as a legal or de facto agent for any outside entity engaged in any of the above activities.

School Implementation Plans may define "related outside entity" beyond the definition provided above. You should consult your school's Plan carefully.

Significant Financial Interest includes, but is not limited to, (1) financial compensation, including travel, from consulting, employment, managerial, and fiduciary relationships that, when aggregated over the preceding twelve months, exceed \$5,000; (2) equity and other financial interests above \$5,000; (3) equity interests of any amount, or entitlement to the same, in a non-publicly traded, for-profit, entity; and (4) intellectual property rights and interests (e.g. patents, copyrights), upon receipt of income related to such rights and interests. "Financial compensation" does not include, for example, interests of any amount in diversified financial holdings, or royalties or other remuneration paid by Harvard.

School Implementation Plans may define "significant financial interest" beyond the definition provided below. You should consult your school's Implementation Plan carefully.