

**President and Fellows of Harvard College Financial Conflict of Interest Reporting Form
(for all non-Harvard investigators at institutions not registered in the FDP Clearinghouse)**

Instructions: This form must be completed prior to proposal submission by all non-Harvard personnel listed as "PHS investigator and/or key personnel" at an institution not registered in the [FDP Clearinghouse](#). This is necessary in order to comply with the Public Health Service (PHS) regulations on Responsibility of Applicants for Promoting Objectivity in Research for which PHS Funding is Sought (42 C.F.R. Part 50, Subpart F) and Responsible Prospective Contractors (45 C.F.R. Part 94), and may be requested as part of an NSF-sponsored proposal at Harvard as well.

SECTION I - GENERAL INFORMATION

Non-Harvard Investigator name:

Home institution:

Title of project:

Harvard PI on project:

SECTION II - FCOI POLICY

Does your home institution have an FCOI policy and disclosure process that meets PHS requirements? Yes No
If yes, proceed to Section V.

SECTION III – FINANCIAL INTERESTS

Do you (or your spouse and dependent children) have any significant financial interests* that are directly related to the proposed project listed above? Yes No

If yes, an official from our institution will contact you in order to appropriately document the significant financial interest in question. In the event the proposal is funded, at the Just-in-Time phase, the official will work with you in order to eliminate or manage the conflict. This must be completed prior to spending on the award. All interests must be disclosed to Harvard within 30 days of discovering the new interest.

SECTION IV - TRAINING

If your home institution does not have an FCOI policy and disclosure process that meets PHS requirements, our institution is required to provide you with FCOI training prior to you engaging in research on this project. Please read the "fCOI Training" posted online at https://vpr.harvard.edu/files/ovpr-test/files/fcoi.harvard.edu_training_pdf. Your signature below will attest that you have read the document and understand its contents.

SECTION V - SIGNATURE

Investigator Signature: _____ Date: _____

E-mail: _____ Phone: _____

**Significant financial interest means:*

A financial interest 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:

- (i) With regard to any publicly traded entity, a *significant financial interest* exists if the value of any remuneration received from the 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;
- (ii) With regard to any non-publicly traded entity, a *significant financial interest* exists if the value of any remuneration received from the entity in the twelve months preceding the disclosure, when aggregated, exceeds \$5,000, or when the Investigator (or the Investigator's spouse or dependent children) holds any equity interest (e.g., stock, stock option, or other ownership interest); or
- (iii) Intellectual property rights and interests (e.g., patents, copyrights), upon receipt of income related to such rights and interests.