Investigator Financial Disclosure Policy
(Applicable to all Sponsored Project Proposals)

What is required?
Federal regulations require institutions to have policies and procedures in place that ensure that investigators disclose any significant financial interest that may present an actual or potential conflict of interest in relationship to externally sponsored projects. Such disclosures must be made prior to the submission of a proposal for funding,* and institutions must develop specific mechanisms by which conflicts of interest will be satisfactorily managed, reduced, or eliminated prior to the expenditure of any funds on an award.

* If a now reportable significant-conflict of interest arises at any time during the period after the submission of the proposal through the period of the award, the filing of a disclosure is also required.

Who is covered?
“Investigator” means the principal investigator/project director, co-principal investigators, and any other person at the University who is responsible for the design, conduct, or reporting of research, educational, or service activities funded, or proposed for funding, by an external sponsor. In this context, the term “Investigator” includes the investigator's spouse and dependent children.

What must be disclosed?
Each Investigator shall disclose all significant financial interests:
(i) that would reasonably appear to be affected by the research, education, or service activities funded, or proposed for funding, by an external sponsor; or
(ii) in entities who financial interests would reasonably appear to be affected by such activities.

What is covered?
“Significant financial interests” means anything of monetary value, including, but not limited to, salary or other payments for services (e.g., consulting fees or honoraria); equity interests (e.g., stock, stock options or other ownership interests); and intellectual property rights (e.g., patents, copyrights and royalties from such rights). The term does not include:
(1) Salary, royalties, or other renumeration from Xavier University;
(2) Income from seminars, lectures, or teaching engagements sponsored by public or nonprofit entities;
(3) Income from service on advisory committees or review panels for public or nonprofit entities; or
(4) An equity interest that when aggregated for the Investigator and the Investigator's spouse and dependent children, meets both of the following tests: does not exceed $10,000 in value as determined through reference to public prices or other reasonable measures of fair market value, or, constitute more than a five percent ownership interest in any single entity; or
(5) Salary, royalties or other payments that when aggregated for the Investigator and the Investigator's spouse and dependent children over the next twelve months, are not expected to exceed $10,000.

Disclosure Procedures:
(1) All Investigators must disclose their significant financial interests utilizing the accompanying form and attaching all required supporting documentation. The completed form and packet must be submitted with the proposal to the Office of the Associate Academic Vice President. Supporting documentation should be submitted in a sealed envelope marked confidential.
(2) In accordance with Federal regulations, a complete disclosure must be made by Investigator(s) prior to submission of the proposal.
(3) Resolutions to conflicts of interest will be incorporated into a Memorandum of Understanding between the Investigator(s) and the University (signed by Investigator(s), the Department Chair, the Dean, and the Academic Vice President) prior to any award funds.
I have read the attached Investigation Financial Disclosure Policy and

No  ____  I have no significant financial interests (as defined) which would be directly and significantly affected by the research, educational, or service activities funded, or proposed for funding, by an external sponsor.

Yes  ____  I have significant financial interests (as defined) which would be directly and significantly affected by the research, educational, or service activities funded, or proposed for funding, by an external sponsor.

________________________________________
Signature

Name:

Date:

If you have checked Yes you must see the Associate Academic Vice President and complete a “Resolution Plan Questionnaire” prior to the submission of the proposal. Resolutions to conflicts of interest will be incorporated into a Memorandum of Understanding between the Investigator(s) and the University prior to expenditure of any award funds.