**Financial Conflicts of Interest Related to Research and Sponsored Programs**

**Worksheet: Preparing a Disclosure**

This worksheet is designed to help you prepare the information required to submit a Financial Conflict of Interest (fCOI) disclosure. This worksheet is an optional tool. It does not need to be completed, retained, or submitted.

**Completing this worksheet is not a substitute for submitting a required disclosure per the instructions provided to you by the Office of Research Integrity.** However, completing this worksheet can help you prepare and gather the information necessary to later submit a formal disclosure to the Office of Research Integrity.

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| **Step 1: Listing Significant Financial Interests (SFI)**  Review each category of Significant Financial Interest listed below. Consider if you, or any members of your family, have any SFIs based on these definitions, and check off those that apply.   * Your “family” includes your spouse, domestic partner, dependent children, and any persons residing in your household. * SFIs should be disclosed if they are applicable during the preceding 12 months or anticipated in the 12 months following the date the disclosure will be made.   Later in step 3, you will determine if each of your SFIs reasonably appears to be related to any of your University Research or Sponsored Programs. Only SFIs that reasonably appear to be related need to be disclosed. Therefore, only consider SFIs that you are confident are related or where you are unsure if they are related. For example, if your spouse is employed in consumer marketing at Coca Cola, and your academic research at Lehigh is focused on quantum computing, you do not need to determine if you need to disclose your spouse’s income as an SFI related to your research, because it is apparent that it is not. | |
|  | **Publicly Traded Entities.** SFI exists if the sum of:  (a) the total value of any remuneration received by you or your family from the external entity during the preceding 12 months or anticipated in the 12 months following the date of the disclosure, and  (b) the value of any equity interest in the external entity as of the date of disclosure exceeds $5,000.  Remuneration includes salary and any payment for services not otherwise identified as salary (e.g., consulting fees, honoraria). 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. |
|  | **Non-publicly traded entities.** SFI exists if the value of any remuneration received by you or your family from the external entity in the 12 months preceding the disclosure or anticipated in the 12 months following the date of the disclosure either:  (a) exceeds $5,000, or  (b) you and/or your family hold any equity interest (e.g., stock, stock option, or other ownership interest) regardless of its value. |
|  | **Intellectual property rights (including royalties).** You and/or your family’s received income in the twelve months preceding this disclosure or anticipate receiving income in the twelve months following the disclosure related to intellectual property rights and interests (e.g., patents, patent applications, copyrights). |
|  | **Management Position.** You (not your family) held a management position, such as a director, officer, partner, president, vice-president, or trustee, in any external entity in the twelve months preceding the disclosure, or anticipates holding a management position in the twelve months following the disclosure. |
|  | **Talent Recruitment.** You and/or your Family participated in, or received support from, a Foreign Government-Sponsored Talent Recruitment Program, in the twelve months preceding the disclosure or anticipates doing so in the twelve months following the disclosure. A Foreign Government-Sponsored Talent Recruitment Program is defined as an effort organized, managed, or funded by a foreign government, or foreign government instrumentality or entity, that is intended to recruit science and technology professionals or students (regardless of citizenship or national origin, and whether having a full-time or part-time position). For purposes of this definition, support includes cash, research funding provided other than through Lehigh University, complimentary foreign travel, honorific titles, career advancement opportunities, promised future compensation, or other types of remuneration or consideration, including in-kind compensation. |
|  | **Sponsored Travel - for PHS funded Personnel only**. Any travel that is reimbursed or paid on your (and not your family’s) behalf, related to your Lehigh responsibilities. This excludes any travel that is reimbursed or sponsored by Lehigh University; a U.S. federal, state, or local government agency; a U.S. non-profit 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 an institution of higher education in the U.S. |
|  | **For Department of Energy funded Personnel only:** Any reimbursed or sponsored travel (i.e., that which is paid on your behalf and not reimbursed to you, so that the exact monetary value may not be readily available) related to your institutional responsibilities that is not otherwise disclosed in current and pending or other support disclosures. This does not apply to travel that is reimbursed or sponsored by a Federal, state, or local government agency of the United States; a domestic Institution of Higher Education; or a domestic research institute that is affiliated with a domestic Institution of Higher Education. |
| **Significant Financial Interests do not include the following (i.e. do not require disclosure):**   * Salaries, royalties, or other remuneration paid by Lehigh University to you, including intellectual property rights assigned to the institution and agreements to share in royalties related to such rights. * Income from investment vehicles, such as mutual funds and retirement accounts, as long as the individual does not directly control the investment decisions made in these vehicles. * Income from seminars, lectures, or teaching engagements sponsored by, or income from service on advisory committees or review panels for a U.S. federal, state, or local government agency; a non-profit U.S. 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 non-profit U.S. institution of higher education as defined at 20 U.S.C.1001(a). * Any paid-for or reimbursed travel determined by Lehigh University to not constitute an SFI. | |

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| **Step 2: Lehigh University Research**  The Office of Research Integrity has provided you a list of your Current and Pending Sponsored Programs from Banner. These are your “Sponsored Programs”. You will also need to consider any other research activity in which you have participated in the design, conduct, reporting, or direct administration during the preceding 12 months to the present. This other research activity, which is not included in your Sponsored Programs list, is your “University Research.”  Please consider the entirety of your Lehigh research portfolio: your Sponsored Programs plus your University Research. | |
| **In Step 2, identify each Sponsored Program and University Research project on which you are Project Personnel.**  For Sponsored Programs listed in Banner, list by the six-digit “LU number”. For other University Research, use other identifying information unique to each specific project. | **In Step 3, check if Related to an SFI (see detailed instructions below)** |
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**Step 3: Determine if SFIs are Related to Lehigh University Research**

Return to each Sponsored Program and University Research project listed during Step 2 above. For each individual project, consider whether any SFIs listed during Step 1 reasonably appear to be related to the project. Make a reasonable, good-faith determination.

* If the individual project could potentially affect the value of the financial interest, or have a financial impact on the external entity in which the SFI is held, it may be considered “related”, and should be disclosed.
* If the individual project could affect you or your family’s ability to fulfill obligations to the External Entity, it may be considered “related,” and should be disclosed.
* If the business focus of the external entity in which the SFI is held is not related to the focus of the research project, it is unlikely that they are considered “related” and does not need to be disclosed.

**Step 4: If applicable, gather any additional information that may be required to submit a disclosure. There will be two options at this point, depending on the results of Steps 1 through 3 above:**

**Option 1 - you have no related SFIs to disclose:** if after completing Steps 1 - 3, you have determined that you have no related SFIs to disclose, you do not need to gather any additional information. Please email [incoi@lehigh.edu](mailto:incoi@lehigh.edu) or respond to the email you received requesting a disclosure, and indicate that you have determined you have no related SFIs. You do not need to retain or submit this worksheet.

**Option 2 - you have related SFIs to disclose:** if after completing Steps 1 - 3, you have determined that you have related SFIs to disclose, you will need to provide more detailed information about the external entity and the relationship to your research with your disclosure. Gather any documentation that will help with identifying the external entity in which the SFI is held, and detailed information about the SFI, including W-2 forms from organizations other than Lehigh, 1099s, quarterly statements detailing equity, etc.

The following information for each SFI will be collected on the disclosure (note that there is an “n/a” response option when the question is not applicable to a Related SFI):

* For SFIs related to University Research: the name of the related research project or other appropriate identifying information.
* For SFIs related to Sponsored Programs: the six-digit “LU number(s)” of the related award(s), as listed on the Current and Pending Awards list provided to you by the Office of Research Integrity.
* Name of the external entity.
* Type of entity:
  + Business
  + Non-profit
  + Government of another country, including local, provincial, or equivalent governments of another country
  + Foreign Institutes of Higher Education
  + Other
* Income in the 12 months preceding the disclosure, or anticipated in the 12 months following the disclosure (yes or no response).
* Source of income:
  + Honoraria
  + Consulting
  + Salary
  + Dividends
  + Family’s earnings
  + Travel expenses paid for or reimbursed to you (and not your family)
  + No income
  + Other
* Approximate aggregate dollar value of equity interests (e.g. stock, stock options, real estate, investment, or other ownership). You will be asked to provide the response in ranges between:
  + $0-5,000
  + $5,000 - $25,000
  + $25,000 - $50,000
  + $50,000 - $75,000
  + $75,000 - $100,000
  + Greater than $100,000
* Percentage ownership interest. You will be asked to provide the response in ranges between:
  + Below 5%
  + 5-49%
  + Greater than 50%
* You will be asked to disclose whether any of the following are applicable:
  + For a publicly traded external entity: whether the sum of (a) the total value of any remuneration you or your family have received from the external entity in the twelve months preceding the disclosure or anticipated in the twelve months following the disclosure and (b) the value of any equity interest in the external entity as of the date of this disclosure exceeds $5,000.
  + For a non-publicly traded external entity: whether the value of any remuneration you/your family has received from the external entity in the twelve months preceding the disclosure or anticipated in the twelve months following the disclosure either, (a) exceeds $5,000, or (b) if you/your family hold(s) any equity interest (e.g., stock, stock option, or other ownership interest) regardless of its value.
  + Whether income received by you and/or your family in the twelve months preceding this disclosure or anticipated in the twelve months following this disclosure is related to intellectual property rights and interests (e.g., patents, patent applications, copyrights).
  + Whether you held a management position in any entity, such as a director, officer, partner, president, vice president, or trustee, in the twelve months preceding the disclosure or anticipated in the twelve months following the disclosure.
  + Whether you and/or your family participated in or received support from a Foreign Government-Sponsored Talent Recruitment Program, defined as an effort directly or indirectly organized, managed, or funded by a foreign government, foreign state-owned enterprise, or a foreign institution, that is intended to recruit science and technology professionals or students (regardless of citizenship or national origin, and whether having a full-time or part-time position). Support includes cash, research funding provided other than through Lehigh University, complimentary foreign travel, honorific titles, career advancement opportunities, promised future compensation, or other types of remuneration or consideration, including in-kind compensation.
  + For PHS proposals only: Any travel that was reimbursed or paid on your behalf (and not on behalf of your family), related to your Lehigh responsibilities. This excludes any travel that is reimbursed or sponsored by Lehigh University; a U.S. federal, state, or local government agency; a U.S. non-profit 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 an institution of higher education in the U.S.
  + For Department of Energy proposals only: Any reimbursed or sponsored travel (i.e., that which is paid on your behalf and not reimbursed to you, so that the exact monetary value may not be readily available) related to your institutional responsibilities that is not otherwise disclosed in current and pending or other support disclosures. This does not apply to travel that is reimbursed or sponsored by a Federal, state, or local government agency of the United States; a domestic Institution of Higher Education; or a domestic research institute that is affiliated with a domestic Institution of Higher Education.
  + Whether the external entity is a proposed subcontractor, consortium member, supplier of goods, lessor, or otherwise involved with your Sponsored Programs or University Research (yes or no response).
* You will be asked to provide a description of the relationship between the SFI and each sponsored program or research activity that is being identified in the disclosure as related to the SFI. The description must include any involvement with students, staff, and Lehigh University resources.