**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 in response to the annual solicitation distributed in January/February 2021.

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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 here 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. 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); and 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:(a) when aggregated, exceeds $5,000, or (b) when you and/or your family holds any equity interest (e.g., stock, stock option, or other ownership interest) regardless of its present value. |
| **☐** | **Intellectual property rights (including royalties).** Your and/or your family’s receipt of income in the twelve months preceding this disclosure related to intellectual property rights and interests (e.g., patents, patent applications, copyrights). |
| **☐** | **Management Position.** Includes a management position, such as a director, officer, partner, president, vice-president, or trustee, held by you (but **not** your family) in any external entity. |
| **☐** | **Sponsored Travel - for PHS awards or cooperative agreements only**. Any travel that is reimbursed or paid on your (and **not** your family’s) behalf, related to your Sponsored Programs or University Research, and determined by Lehigh to constitute or contribute to an SFI. 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. |
| **☐** | **Talent Recruitment.** Participation by you or your family in or support from a foreign talent recruitment program: an entity based outside of the U.S. that provides direct compensation to individuals in exchange for the agreement to transfer knowledge, expertise, or other intellectual assets to the foreign entity. For purposes of this definition, direct compensation includes money, research funding provided other than through Lehigh University, access to research facilities or other in-kind support, real or honorific titles, career advancement opportunities, promised future compensation, or other types of remuneration/consideration. |
| **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 from January 1, 2020 to January 31, 2021. 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 from January 2020 to the present. This other research activity, which is not included in your Sponsored Programs list, is your “University Research”.Please consider 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, you may wish to list by proposal number, as this is the reference collected when you submit a formal disclosure. For other University Research, e.g. supported with Department Funds, 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 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. You are ready to submit a disclosure per the instructions provided to you by the Office of Research Integrity. On your disclosure, indicate that you have no SFIs related to your Lehigh University Sponsored Programs or University Research. 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 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 LU proposal(s) 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
	+ Paid authorship
	+ Family’s earnings
	+ 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%
* Intellectual property rights and interests (e.g., patents, patent applications, copyrights) for you or your family assigned to or to be assigned to the external entity, upon receipt of income related to such rights and interests.
* A management position in the external entity (e.g. director, officer, partner, president, vice-president, or trustee). This does **not** apply to management positions held by your family.
* For PHS awards only: any travel that is reimbursed or paid on your behalf (and **not** on behalf of your family) by the external entity, related to your Sponsored Programs or University Research, and determined by Lehigh to constitute or contribute to an SFI.
* Your own or your family’s participation in or support from a talent recruitment or development program based outside of the U.S.
* Whether the external entity is a proposed subcontractor, consortium member, supplier of goods, lessor, or otherwise involved with your Sponsored Programs or University Research.
* 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.