

**Xavier University of Louisiana**  
**CONFLICT OF INTEREST DISCLOSURE FORM**

Faculty/Staff Name: \_\_\_\_\_

Department/Unit: \_\_\_\_\_

College/Unit: \_\_\_\_\_

Project Title: \_\_\_\_\_

Agency To/By Which Proposal is being submitted or funded: \_\_\_\_\_

- I. \_\_\_\_\_ At this time, I have no known conflicts of interest with this proposal (Go directly to Section III. Signature Line).
- II. \_\_\_\_\_ At this time, I do have a conflict of interest/significant financial interest (see below)

*Significant Financial Interest* means anything of monetary value, including but not limited to, salary or other payments for services (e.g., consulting fees or honoraria); equity interests (stocks, bonds or interest therefrom); and intellectual property rights (patents, copyrights and royalties therefrom).

The term does **not** include:

1. Income from the applicant institution;
2. Any ownership interests in the institution, if the institution is an applicant under the SBIR program;
3. Income from seminars, lecture, or teaching engagements sponsored by public or non-profit entities;
4. Income from service on advisory committees or review panels for public or nonprofit entities;
5. An equity interest that when aggregated (and including the investigator's spouse and children) does not equal \$5,000 using fair market value prices, and an ownership interest of not more than five percent in any single entity;
6. Salary, royalties or other payments that when aggregated for the Investigator and the Investigator's spouse and children over the next twelve months, are not expected to exceed \$5,000.

- III. All Principal Investigators are required to complete the Responsible Conduct of Research (RCR)/COI training. RCR/COI training should be completed prior to the PI's proposal submission and at least every four years, and immediately under the designated circumstances:
- Institutional Financial Conflict of Interest (FCOI) policies change in a manner that affects Investigator requirements
  - An Investigator is new to the Institution
  - Institution finds an Investigator noncompliant with the Institution's FCOI/Misconduct Under Externally Sponsored Agreements (MUESA) policy or management plan

Xavier has designated the Collaborative Institutional Training Initiative (CITI) located at [www.citiprogram.org](http://www.citiprogram.org) as the formal training on the policy.

\_\_\_\_\_ I have completed and passed the CITI RCR/COI training on \_\_\_\_\_ (date).

\_\_\_\_\_ I will complete the CITI RCR/COI training prior to the start of research. I understand that fiscal will not activate a fund code for my award until I have passed the course.

\_\_\_\_\_ As PI, I have informed the key personnel/collaborators listed below of the training requirement as well.

\_\_\_\_\_  
Key Personnel/Collaborator

\_\_\_\_\_  
Key Personnel/Collaborator

**For examples of potential conflicts, please see below.**

I am disclosing the following significant financial interests related to the above named project (see list below and check all that apply) and attaching supporting documentation (in an envelope marked Confidential) that identifies the business enterprise or entity involved and the nature and amount of interest.

\_\_\_\_\_ Salary or other payment for services (e.g., consulting fees or honoraria)

\_\_\_\_\_ Equity interests (e.g., stocks, stock options, or ownership interests)

\_\_\_\_\_ Intellectual property rights (e.g., patents, copyrights, and royalties from such rights)

\_\_\_\_\_ Other significant financial interests of the Investigator that possibly could affect or be perceived to affect the results of the research or educational activities funded or proposed for funding

***Note: The Associate Vice President for Research and Sponsored Programs will review this conflict of interest disclosure and determine whether or not to impose certain conditions or restrictions that might be used to manage the conflict, including:***

- A. Public disclosure of significant financial interests;
- B. Monitoring of the project by independent reviewers;
- C. Modification of the project plan;
- D. Disqualification from participation in all or a portion of the project;
- E. Divestiture of significant financial interests, and/or;
- F. Severance of relations that create actual or potential conflicts.

**IV. Signature Line:**

I agree to: 1) Update this disclosure during the performance period of this award, either on an annual basis, or as new reportable, significant financial interests are obtained; and 2) Comply with any conditions or restrictions imposed by the University to manage, reduce or eliminate actual or potential conflicts of interest or forfeit the award.

*I have read and understand the university's conflict of interest policy and have made all financial disclosures required by it and will comply with any conditions or restrictions imposed by the institution to manage, reduce or eliminate actual or potential conflicts of interest.*

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Signature of Investigator

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Date

### **Examples of Potential Conflicts of Interest – Are These Conflicts?**

- **Example #1:** Consultant for Pfizer, earning \$50,000 per year to advise on anti-hypertension candidate compounds in clinical trials sponsored by Pfizer's competitors and PI of NHLBI grant for research on how a particular virus damages heart muscle.

*Ans:* No, because there is clearly no relationship between what the individual is doing for Pfizer and the NIH research

- **Example #2:** Consultant for Pfizer, earning \$50,000 per year to advise anti-hypertension candidate compounds in clinical trials sponsored by Pfizer's competitors and PI of a Pfizer clinical trial of one of its own anti-hypertension drugs.

*Ans:* No, because no NIH research is involved

- **Example #3:** An inventor of technologies licensed to a Company founded and owned 30% by the inventor and the inventor is involved in an NIH-sponsored clinical trial of compounds related to the technologies.

*Ans:* Yes

- **Example #4:** Consultant for Pfizer, earning \$10,000 per year to make presentation to cardiologists on the science behind a Pfizer anti-hypertension drug and PI of an NHLBI-sponsored clinical trial of the same Pfizer drug.

*Ans:* Yes, because the individual is receiving over \$5,000 from Pfizer

- **Example #5:** Inventor of a compound UMB has licensed to Pfizer, receiving \$150K per year in royalties and Investigator on NIH grant to develop a similar compound having less unpleasant side effects.

*Ans:* No, because although the royalty payments and NIH research are probably related, the royalty payments are coming to the Investigator through UMB and not directly from Pfizer.