GUIDANCE DOCUMENT: GE0002 | DISCLOSURES FOR RESEARCH ACTIVITIES



GENERAL COUNSEL Policies

The chart below provides a high-level overview of disclosure requirements in research if federally sponsored by the Public Health Service (PHS) and those sponsors enforcing the same requirements. **UT has adopted the PHS disclosure requirements which are reflected in the <u>OID Form</u>.**

Together, we can help ensure that your research is conducted in an open academic environment and continues without interference, bias, restrictions on results, or any burdens on personnel, students, and facilities.

Category	PHS and Agencies Using PHS Requirements
Disclosure Events	 PHS research contract/grant Non-governmental entity which flows down PHS funds Research funding from organizations that follow PHS disclosure requirements
Key Terms/Thresholds	 A significant financial interest (SFI) is defined by PHS as: If publicly traded entity, value of compensation and equity interest, in aggregate, > \$5,000 If non-publicly traded entity, total value of compensation > \$5,000 or any equity interest, regardless of value Income received related to intellectual property > \$5,000 Reimbursed or sponsored travel > \$5,000 Includes SFIs of the Investigator and the Investigator's spouse and dependent children that are related to the Investigator's "institutional responsibilities" Additional information regarding the National Institutes of Health (NIH) requirements for disclosing SFIs can be found within <u>NIH Grants and Funding FAQs, Section E.</u>
Timing	 With the initial and renewal proposals With supplemental funding proposal With non-competing continuation With no cost time extension When a new researcher/investigator(s) is added At least annually for duration of project With any new significant financial interest Within thirty (30) days of acquiring or discovering a new SFI or an SFI that was not disclosed timely. With any discovery of a SFI that was not previously identified/managed, a retrospective review must be conducted in accordance with NIH requirements. Please see steps identified within the <u>NIH Grants and Funding FAQs, Section 1.</u> Additional information regarding the NIH requirements can be found at 42 CFR § 50.605 Management and reporting of financial conflicts of interest and § 50.606 Remedies.

NOTE: Other federal and state agencies, including the National Science Foundation (NSF), industry sponsors, and non-profit research associations may have their own standards for disclosure and it is important that you understand them if you engage in research with a particular agency.

Always ask a supervisor or contact a subject matter expert if you have any questions or concerns. When in doubt, disclose.

This Guidance Document is intended to promote transparency and further compliance with University Policy GE0002 by providing helpful guidance, instruction and/or non-exhaustive lists or illustrative examples to help guide the reader. This Guidance Document has no force or effect on any University Policy or Related Procedure and readers should contact appropriate subject matter experts, including their supervisor, for further guidance. This Guidance Document was created pursuant to University Policy GE0001.