

IU Conflict of Interest and Commitment Disclosure Form

Indiana University is an institution of public trust and consistent with our Principles of Ethical Conduct and University policies, we have an obligation to be objective and impartial in making decisions on behalf of the University.

To ensure this objectivity, members of the IU community are expected to:

- Prevent individual or institutional conflicts of interest/commitment in their assigned duties for the University;
- Disclose potential conflicts of interest and adhere to any requirements created to manage or eliminate any conflicts of interest;
- Ensure personal relationships do not interfere with objective judgment in decisions affecting University employment or the academic progress of a Community Member or a student; and
- Ensure their assigned duties for the University receive their full effort, attention, and commitment.

This integrated Conflict of Interests and Commitment Disclosure Form ("Disclosure Form") collects information related to conflicts of interest, conflicts of commitment, and related topics in order to allow the University to comply with various federal and state regulations, as further detailed in University policies.

Faculty and staff must disclose their outside activities and/or Significant Financial Interests in outside organizations that relate to their University Responsibilities **on an annual basis**

by submitting the Disclosure Form. In addition, an updated Disclosure Form must be submitted **within 30 days of any significant change in outside interests or Significant Financial Interests**

The Disclosure Form will include additional sections, or questions, based on your responses. Please be certain to

answer all primary and follow-up questions

when completing your disclosure. If you need to exit the form and return to it later, your progress will be saved.

Following submission, a completed Disclosure Form is reviewed by the appropriate Committee and/or Unit Head. If additional action is required after the review of your disclosure, you will be contacted directly.

All disclosures will be maintained within the Kuali COI-C System. To review your current Disclosure Form, or update your information, log into the Kuali COI-C System via One.IU.edu.

Please visit

[**University Compliance Conflicts of Interest**](#)

to access relevant policies and explore additional information and guidance.

Should you have questions or require assistance with the form, please contact the appropriate office below:

General Form Questions -

University Compliance Office at

comply@iu.edu

Research-Related Form Questions -

Research Conflict of Interest (COI) at

coi@iu.edu

Foreign Influence Questions -

Research Security Office (RSO) at

rsohelp@iu.edu

What Are Your Roles at IU?

From the list of options below,

SELECT ALL ROLES HELD AT IU

. All roles must be selected

to properly populate individual disclosure form sections.

If you are unsure what roles to select, visit

[**University Compliance**](#)

for more instruction.

UNIVERSITY EMPLOYEE: Includes faculty and academic employees; student academic appointees; and staff and temporary employees

RESEARCHER: Includes PI, Co-Investigator, or Key Personnel on any research/sponsored project having responsibility for the design, conduct, or reporting of IU research

In addition to being a university employee, are you

also

employed by, IU Health or IU Health Physicians?

Only select Yes if you are an IU employee who has a dual appointment at IU Health.

If you are

only

an employee of IU Health, please deselect University Employee.

No

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Research Conflict of Interests Training

Please read the following training information as it pertains to your role and participation in research as an IU Faculty or Staff Member:

IU Policy on Financial Conflicts of Interest in Research

University personnel and students who are covered by the Indiana University Policy on Financial Conflicts of Interest in Research share an obligation to conduct their professional affairs in a manner consistent with the University's mission and to conduct their relationships with each other and the University with candor and integrity. This policy requires individuals to identify and, when possible, avoid financial conflicts of interest. When conflicts cannot be avoided, covered persons must disclose outside financial relationships that create, or reasonably appear to create, conflicts of interest, and work with University officials to manage or resolve those conflicts. The IU policy applies to all persons at IU who are "Investigators" which includes anyone who is responsible for designing research, collecting research data or performing other substantive research activities, or reporting research. It has been developed in part to meet federal regulations, described below.

Federal Regulations

The Public Health Service and other federal agencies have promulgated regulations to promote objectivity in research by establishing standards that provide a reasonable expectation that the design, conduct, and reporting of research funded under grants or cooperative agreements is free from bias resulting from Investigator financial conflicts of interest (FCOI). The Investigator, the Institution, and the funding agency share responsibility to ensure reported research is free from bias. Under IU's Policy and these federal regulations, a Significant Financial Interest is an outside financial interest that reasonably appears related to an individual's university responsibilities. Your responsibilities include, but are not limited to, activities such as research, research consulting, teaching, professional practice, institutional committee membership and service on panels such as Institutional Review Boards or Data Safety Monitoring Boards. An FCOI means a significant financial interest that could directly and significantly affect the design, conduct, or reporting of research. Family members are defined as the individual's spouse and dependents.

Investigator Responsibilities

Investigators must disclose financial interests of themselves and their spouse and dependent children ("family members") related to the investigator's university responsibilities that:

1. Exceed \$5,000 from one entity in the preceding twelve months. This includes equity ownership, remuneration, reimbursed or sponsored travel, and/or interests or rights from intellectual property when aggregated together.
2. Ownership interests (e.g., stock, stock options, or other forms) of:
 - a. ANY amount in a non-publicly traded entity (such as start-up company or small business),
or
More than \$5,000 in value or 5% ownership in a publicly-traded entity.

NOTE:

Do not report teaching or review panel compensation or travel reimbursed or sponsored when such compensation or travel reimbursement is paid by a US federal, state, or local government agency, a US Institution of higher education, a US academic teaching hospital, a US medical center, or a research institute that is affiliated with a US Institution of higher education. You do not need to include income from investment vehicles, such as mutual funds and retirement accounts, as long as the Investigator does not directly control the investment decisions made in these vehicles.

Applicable to those seeking federal funding:

I understand that this Disclosure is required to obtain funding from the U.S. Government. I certify to the best of my knowledge and belief that the information contained in this Disclosure Statement is true, complete, and accurate. I understand that any false, fictitious, or fraudulent information, misrepresentations, half-truths, or omissions of any material fact, may subject me to criminal, civil or administrative penalties for fraud, false statements, false claims, or otherwise. (18 U.S.C. §§ 1001 and 287, and 31 U.S.C. 3729-3730 and 3801-3812). I further understand and agree that:

1. The statements and representations made herein are material to U.S. Government's funding decision, and;
2. I have a responsibility to update the disclosures during the period of performance of the award should circumstances change which impact the responses provided above.

I have read and understand my obligations under University Policy and Federal Regulations and accept my responsibilities concerning Conflict of Interest. I accept and will comply with the conditions and restrictions established by the University to manage, reduce, and/or eliminate any actual or perceived conflicts of interest.

Should you have questions or require assistance, please contact
Research Conflict of Interest (COI)
at
coi@iu.edu

Research Conflict of Interests

NOTE: Selecting "Yes" to any of the questions below will prompt completion of the "Outside Entity Information" section of this form.

During the last 12 months, did you or your family members receive aggregated compensation, monetary or otherwise, exceeding \$5000 in value from any single external entity (not IU) operating in areas relating to your IU responsibilities?

Please include

any

compensation paid to you and your family members such as but not limited to: Consulting fees, Honoraria, Speaking fees, Sponsored or reimbursed travel, Income related to any interests or rights in intellectual property, Stipends, Dividends, Stock options, Gifts.

No

Did you and/or your family members hold at some point during the past 12 months, any ownership interest in a publicly traded external entity operating in areas relating to your IU responsibilities and which, when aggregated together for all of you, represents an equity interest that exceeds \$5000 in value or 5% ownership of a publicly traded entity?

No

Did you and/or your family members hold at some point during the past 12 months, an ownership interest in a non-publicly traded external entity operating in areas relating to your IU responsibilities (e.g., a faculty start-up company or family business related to your research)?

No

Are you part of a Foreign Government Talent Recruitment Program (FGTRP)?

Distinguishing features of a FGTRP covered by federal policies include compensation or recruitment by non-US entities or foreign governments through methods such as:

(a) Compensation provided by a foreign state to a targeted individual in exchange for the individual transferring knowledge and expertise to the foreign country. The compensation can take several forms, such as cash, research funding, honorific titles, career advancement opportunities, promised future compensation, or other types of remuneration or other consideration, or;

(b) Recruitment through a foreign state sponsor's active engagement in attracting a targeted individual to join the foreign-sponsored program and transfer their knowledge and expertise to the foreign state. The targeted individual may be employed and located in the United States, or in the foreign state. Note that, generally, an invitation by a foreign state to simply attend or present work at an international conference would not constitute recruitment.

No

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at
coi@iu.edu

General (Non-Research) Conflict of Interests and Conflicts of Commitment

Please select ALL types of outside activities below in which you are or have been involved during the past 12 months (select

[ALL](#)

that apply):

NOTE: Selecting activities below will prompt completion of the "Outside Entity Information" section of this form.

Note that any interest that you or a dependent have in an IU contract over which you have any influence must, under state law, be approved by the Board of Trustees in advance

. See the [State COI webpage](#) for more details.

I provide PROFESSIONAL work/consultation for or have a PROFESSIONAL affiliation with a domestic or foreign entity other than IU.

Please answer the following questions regarding outside activities:

Are you or a family member the inventor of a patent application or any technology that is the subject of an issued patent or has been optioned or licensed to a company, and on which you are continuing to conduct evaluative or developmental research?

No

Are you in a position in which you supervise or have influence over another University employee with whom you have a familial or personal relationship?

No

During the past 12 months, were you or a family member a director, trustee, officer, partner (general or limited), employee or agent of, or in any managerial position in any organization that has a contractual relationship with IU?

No

During the past 12 months or in the next 12 months, have you had, or do you expect to have, an interest in any contract sale or other transaction to which IU was or is a party?

No

Are there other situations NOT previously listed on this form you think have created or may create an actual or perceived conflict with the interests of the University?

No

Should you have questions or require assistance, please contact the
University Compliance Office
at
comply@iu.edu

Research Security and Foreign Influence

Please read the following information as it pertains to your role and participation in research as an IU Faculty or Staff Member:

Federal and state concerns about transfers of federally funded research and other IP from US universities and businesses to foreign entities have escalated in recent years. Such transfers are often not illegal, but the failure to disclose foreign activities can be, especially as federal funders, and particularly the NIH and the NSF, are interpreting and supplementing their requirements.

If the government can show that a funded researcher failed to disclose foreign activities as part of a grant application, then the government can take (and, increasingly, is taking) legal action against the researcher not because the underlying activity was illegal, but rather because the failure to disclose fully may constitute fraud. This same approach is being used with US universities that receive federal funding. In short, existing and new disclosure requirements are being interpreted to require more disclosure of foreign activities and research support, and to require universities to have a higher level of awareness about our faculty's foreign activities than ever before.

At Indiana University, engagement with foreign students, scholars, and institutions has long been a cornerstone of the university's mission.

We have, and will continue to, advocate forcefully for this critical engagement.

The steps that we are taking in response to the federal and state concerns outlined here are not intended to diminish the robust international activity that is part of the fabric of our institution. Rather, they are intended to help IU meet its obligation to comply with government requirements concerning inappropriate foreign influence and to help inform our faculty and other researchers of these requirements and assist them to avoid legal liability resulting from failure to disclose certain foreign activities. And by acting responsibly and thoughtfully, we may avoid more burdensome, less tailored government requirements.

In addition, while the government is raising these concerns in the context of foreign influence, we believe that for IU and other research universities they also raise questions about research integrity and transparency.

I understand and affirm that I have or will disclose all professional outside relationships in accordance with this policy

Do you have a professional affiliation or sources of research support, that are *not* managed by Indiana University, for which the entity affiliation is disclosed (or will be disclosed) in any professional *grant, publication, or presentation* ?

This does not apply to personal, political, religious, or charitable affiliations.

No

Should you have questions or require assistance with the Foreign Influence portion of the form, please contact the
Research Security Office (RSO)
at
rsohelp@iu.edu

OUTSIDE ENTITY INFORMATION

Based on your previous responses, you are required to complete the 'Outside Entity Information' section of this Disclosure Form

Follow the instructions provided below to add or update entities in your listing:

Is this an
ACTIVE
entity?

Active entities are those in which you have been involved during the past 12 months. To change an existing entity status to active or inactive, select the

Pencil Icon

to the left of the entity. At the top of the dialog box, select the toggle button to active or inactive, scroll down to bottom of dialogue box, and select done.

Yes

Complete the following to define your relationship(s) with this entity:

Entity Name:

Outside Entity

Entity Type:

Select from drop-down:

For Profit (publicly traded)

Describe the business of this entity:

Business of the entity

Is this entity foreign or domestic?

Foreign

Select entity country

Argentina

Do you have a written agreement with this entity (e.g., Consulting agreement)?

No

Will you travel for an extended period (one month or longer) to another university, research lab, or business, in association with this entity?

Include any previously undisclosed travel. This does

not

apply to travel (such as vacations) that does not involve significant work for a third party.

No

Please describe the relationship you and/or your family member has with this entity (you must have at least one). A description of ALL relationships with an entity is required.

(Example, you are a paid consultant for this organization, your spouse volunteers with this organization one weekend a year at their annual gala. In this scenario, you have two relationships for this outside entity, one for 'self', and one for 'spouse'.)

Person involved with this entity :

Self

Relationship:

Select from drop-down:

Offices/Positions

Relationship Type:

Select from drop-down:

Officer

Indicate the aggregate annual amount of compensation (including the total value of any compensation, sponsored or reimbursed travel, intellectual property rights or interest and any other remuneration received or expected to be received from the entity) in the past 12 months:

Select an amount:

\$1 to \$2,499

Select the appropriate option below to describe the engagement activity with this entity:

One-time

Describe the estimated time commitment and expected duration of the above engagement:

Time Commitment

Does this entity sponsor any of your research?

No

Briefly describe your disclosed external relationship(s) with this entity and how they MAY or MAY NOT be related to your IU responsibilities:

External Relationship

Will IU personnel and/or resources such as space, equipment, or facilities be used by this entity or related to your activities with this entity?

NOTE: Do not include IU work done pursuant to sponsored research agreements or incidental use of IU resources.

No

Are products and/or services made by this entity being used during the performance of IU responsibilities?

No

Do you have any attachments to add relevant to this outside entity?

NOTE: You are required to attach any written consulting plans, management plans, nepotism plans, or other written agreements you have with this entity.

No

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Certification

By clicking "I agree" below, I affirm that the information submitted in this form together with any attachments is accurate to the best of my knowledge, that I have read and understand my obligations under applicable university policies and PHS Regulations (if appropriate), and that I will comply with the conditions and restrictions established by the University to manage, reduce, or eliminate any conflicts of interest or conflicts of commitment. Additionally, I commit to providing an updated disclosure form

[within 30 days](#)

of any significant change in the information I have provided.

I agree

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