

DISCLOSURE FORM REQUIRED FOR FEDERAL SUPPORT

To be completed and filed by all FAS **investigators** before submitting proposals to federal agencies requiring disclosures
Important: See the back of this form for the **definition of investigator** according to federal regulations

Section A

Name _____

University Address _____

Office Telephone _____

E-mail Address _____

1. Do you, your spouse, any dependent children, and/or any **Associated Corpus** in aggregate have **Significant Financial Interests**: (i) that would reasonably appear to be affected by activities funded or proposed for funding by the NSF or PHS; or (ii) in **Entities** not controlled by the University whose financial interests would reasonably appear to be affected by such activities?

YES

NO

2. Please sign below to certify: (i) that you have fully and to the best of your ability completed this disclosure form (including, if you answered YES to question 1, separate entries for each relevant entity on photocopied duplicates of Section B below); (ii) that you will update your disclosure form promptly if relevant circumstances change; and (iii) that you understand that all FAS appointees must comply with the *Policies Relating to Research and Other Professional Activities Within and Outside the University* and with other relevant policies contained in *Principles and Policies that Govern Your Research, Instruction, and Other Professional Activities* (the Grey Book).

Please check if you wish to have a copy of the Grey Book sent to your university address.

Signature _____

Date _____

Section B

Name of Entity _____

Activity or product of entity related to current or prospective university-based research or educational activities:

Annual income from entity, including fair value of nonmonetary payments:

\$10,000 or less

More than \$10,000

Basis for payments, gifts, or gratuities to you or your family:

- Participation as employee
- Consulting or occasional lecturing
- Service on Advisory or Directors' Boards
- Writing commissioned papers or reports
- Payment, through Harvard's distribution plan, of royalties on patents and copyrights, etc.
- Payments, not through Harvard's royalty distribution plan, for intellectual property rights
- Other (_____)

Nature of ownership interest in entity:

- Stocks or Stock options
- Partnership
- Other (_____)

Value of ownership interest:

\$10,000 or less

More than \$10,000

Percentage of ownership, issued and outstanding:

5% or less

More than 15% - 50%

More than 5% - 15%

More than 50%

Elaboration of answers to previous questions and description of steps already taken, or being taken, to oversee and/or manage potential conflicts of interest:

If you must submit more than one page, please fill out the following line on each page

Name _____

This is page ____ of ____ pages

Please return this form to the Secretary of the Committee on Professional Conduct (D. R. Gallant, 50 Church Street, Room 536)

OPERATING DEFINITIONS

According to the National Science Foundation (NSF) and Public Health Service (PHS) regulations:

The term **significant financial interest** signifies anything of monetary value, including but not limited to, salary or other payments for services (e.g., consulting fees or honoraria); equity interests (e.g., stocks, stock options or other ownership interests); and intellectual property rights (e.g., patents, copyrights and royalties from such rights). The term does not include:

1. Salary, royalties or other remuneration from (Harvard University);
2. Income from seminars, lectures, or teaching engagements sponsored by public or nonprofit entities;
3. Income from service on advisory committees or review panels for public or nonprofit entities;
4. An equity interest that when aggregated for the investigator and the investigator's spouse and dependent children, meets both of the following tests: Does not exceed \$10,000 in value as determined through reference to public prices or other reasonable measures of fair market value, and does not represent more than a 5% ownership interest in any single entity; or
5. Salary, royalties or other payments that when aggregated for the investigator and the investigator's spouse and dependent children over the next twelve months, are not reasonably expected to exceed \$10,000.

The term **investigator** signifies "the principal investigator, co-principal investigators, and any other person at the institution who is responsible for the design, conduct, or reporting of research or educational activities funded or proposed for funding by NSF or PHS."

In addition:

The term **associated corpus** signifies any trust, organization or enterprise other than the University over which investigators, singly or collectively with members of their households and/or immediate family, exercise a controlling interest.

The term **entity** signifies any legal body created for profit or charitable purposes.

***Instructions for Meeting
Federal Conflict of Interest Regulations***

Investigators who seek National Science Foundation (NSF) or Public Health Service (PHS) research support must disclose to their universities all significant financial interests that would reasonably appear to be affected by this research. The University's conflict of interest policy must specify what must be revealed by "each individual responsible for the design, conduct, or reporting of the research or educational activities funded or proposed for funding" by these agencies.

Relevant **significant financial interests of investigators** (including those of their spouses and dependent children) must be revealed. The terms "investigator" and "significant financial interest" are defined on the back of the Disclosure Form Required For Federal Support. The definitions may also be found on the online Affirmation of Awareness web site. Financial or other interests that would **not** reasonably appear to be affected by a proposed activity need **not** be disclosed. Holdings in mutual funds and retirement accounts will ordinarily fall in this category. The NSF and PHS regulations also exclude interests not exceeding \$10,000 that involve no more than 5% ownership interest. The conflicts associated with mandated disclosures will often be deemed innocuous or readily manageable, often by some mutually agreeable form of disclosure.

To comply with the requirements of federal agencies, the *FAS Policies Relating to Research and Other Professional Activities Within and Outside the University* have been amended as follows:

Every faculty member or PI who may engage in research sponsored by the NSF or PHS, or by other agencies that adopt similar requirements regarding conflicts of interest, must submit as requested (ordinarily, each academic year) a statement that meets these requirements. In the FAS this statement is included in the Affirmation of Awareness Form that every FAS appointee must file. The statements shall be filed with the Secretary of the Committee on Professional Conduct (CPC) who shall hold them in confidence. (Individuals not filing such statements in advance take the chance of encountering delays that force them to miss proposal deadlines.)

On many projects, faculty, post-doctoral fellows, graduate students, and others may share the responsibilities for the design, conduct, and reporting of research. All such "investigators" must have filed an Affirmation of Awareness form or a Disclosure Form Required For Federal Support when proposals are submitted. PIs are best positioned to identify relevant co-workers and should have the relevant information regarding co-workers' potential conflicts of interest for their own protection. Accordingly, PIs should remind non-faculty associates to file an Affirmation of Awareness or a Disclosure Form Required For Federal Support to comply with agency requirements. PIs may request a report on the statements

filed by their non-faculty associates from the Secretary of the Committee on Professional Conduct.

All investigators who are required to submit statements must update them promptly to reflect significant changes in relevant interests.

A special sub-committee of the CPC bears responsibility for reviewing significant Financial Interests of investigators to determine whether they “could directly and significantly affect the design, conduct or reporting of the research.” The sub-committee also considers other issues relating to FAS and University conflict of interest and commitment policies raised by disclosures. Where conflicts are indicated, the sub-committee will take appropriate action to resolve or manage them, sharing information and consulting with the Dean when necessary.

Disclosures of potential conflicts of interest that are satisfactorily managed or otherwise resolved will not be reported to the NSF unless required by federal audit. In the case of PHS grants, institutions must report the existence (but not the nature or other details) of conflicting interests to PHS-funded projects along with assurances that these interests have been managed, before funds are spent. Specific information from individuals’ Affirmation of Awareness forms or Disclosure Forms Required For Federal Support will not be forwarded to agencies without consulting them.