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Travel Disclosure
In the last 30 days I have traveled on four different occasions.
  a) I attended a conference in Zurich, Switzerland which was paid for by my professional society.
  b) I was flown to the University of East Dakota to provide expertise in a clinical trial they are conducting.
  c) I drove to Boise, Idaho to do field research and was reimbursed through the UW by the sponsor of my current grant.
  d) The pharmaceutical company Drugs Plus covered all expenses for my wife and me to attend a seminar in Sandals, Jamaica on a new medication being developed.

What, if any, of these trips do I need to disclose?

Answer:
Investigators that receive funding from Public Health Service (PHS) entities must disclose all Sponsored and Reimbursed Travel regardless of the value.

Investigators that do not receive PHS funding, only must disclose Sponsored and Reimbursed Travel that when aggregated with all other Financial Interests from a particular Entity exceeds the $5,000 SFI threshold.

GIM 10 has uniform guidelines on what types of entities you are required to disclose SFI and travel from regardless of whether you receive PHS
funding or not. According to GIM 10’s guidelines, here’s what you’d be required to disclose in the case scenario above:

a) Travel that is either sponsored or reimbursed by professional societies must be disclosed. Therefore the trip to Zurich and all associated expenses should be disclosed within 30 days of the occurrence of the travel.

b) Travel that is either sponsored or reimbursed by the following do not need to be disclosed: expenses that are reimbursed by the University, a federal, state or local government agency, an Institution of Higher Education, an academic teaching hospital, a medical center, or a research institute that is affiliated with an Institution of Higher Education. Therefore the trip to the University of East Dakota does not need to be disclosed.

c) Travel that is either sponsored or reimbursed by the following do not need to be disclosed: expenses that are reimbursed by the University, a federal, state or local government agency, an Institution of Higher Education, an academic teaching hospital, a medical center, or a research institute that is affiliated with an Institution of Higher Education. Therefore any travel expenses sponsored or reimbursed by the University of Washington do not need to be disclosed.

d) Travel that is either sponsored or reimbursed by publicly-traded or privately-held entity must be disclosed. The trip to Jamaica and all associated expenses must be disclosed within 30 days of the occurrence of the travel.

**Imputed Interests** (Financial Interests held by Immediate Family Members)

I’m currently engaged in pharmaceutical research, and my spouse works for the pharmaceutical company (Drugs Plus) that’s sponsoring my research. My daughter also owns stock in Drugs Plus. Do I need to disclose my Immediate Family Members’ interests in Drugs Plus?

**Answer:**

Yes, investigators are required to disclose the Financial Interests of Immediate Family Members if their interests, when aggregated with those of the Investigator, exceed the threshold for SFI.

Immediate Family Member is defined in GIM 10 as: a person’s spouse, domestic partner, parent, grandparent, grandchild, sibling, child, or anyone who qualifies as the person’s dependent under the U.S. Internal Revenue Code.

When disclosing this relationship in the Financial Interest Disclosure System (FIDS) you will create two separate SFIs, one for your Financial
Interests in the entity and a second for the Financial Interests of all your Immediate Family Members.

**Determining FCOIs**

I am currently receiving funding from the NIH (a Public Health Service awarding component). As a PHS-funded Investigator I’m responsible for disclosing all SFIs that are related to my Institutional Responsibilities. I have disclosed two SFIs that I don’t consider to be related to my research, but could reasonably be considered related to my work at the University of Washington. Who will evaluate the relatedness of my SFI to my research and determine whether they constitute an FCOI?

**Answer:**
The Institutional Official for the University of Washington is the Office of Research. All SFI disclosed via the Financial Interest Disclosure System (FIDS) will be evaluated by the Institutional Official to determine whether the SFI could reasonably affect the design, conduct, or reporting of research. If it is determined that an SFI is related to an Investigator’s research, then the Institutional Official will establish a Management Plan for the Investigator to reduce or eliminate the conflict.

**Transition from Paper-Based Disclosure to Electronic Disclosure**

I submitted a grant proposal to the NIH on 08/01/12 and disclosed an SFI using the paper-based process. I was notified on 08/30/12 that my grant was awarded. Do I need to do anything else since I’ve been awarded after the new policy was put into place?

**Answer:**
Yes, proposals approved by the Office of Sponsored Programs (OSP) before the implementation of FIDS (8/17/12), and awarded after implementation, will be required to do the following prior to the release of funds:

- Update the proposal’s (eGC1’s) personnel list to denote all investigators on the project.
- Re-disclose all SFI in FIDS following the new FCOI Policy (GIM 10) guidelines.
- If a PHS grant is awarded after the new FCOI Policy (GIM 10) is enacted on 8/24/12, all Investigators are required to complete FCOI Policy training.
Compensation vs. Equity

In the last 12 months I have received stock as Compensation from two different Entities. The first Entity is publicly traded and gave me 2000 shares at a current market value of $6000, and 100 shares in stock options. The second Entity is privately held, and gave me 1000 shares which is approximately a 1% ownership stake. How do I determine whether these Financial Interests are Compensation or Equity?

Answer:

- If you receive stock or stock options as Compensation from an Entity that is publicly traded, a market value can be immediately determined and you should disclose that as Compensation if the total value of your Financial Interests with this entity exceed the SFI threshold.
- Stock in privately-held entities does not have an immediate value, and should therefore be disclosed as Equity.
- Note: Stock that you purchase yourself should always be disclosed as Equity. Equity in a publicly traded Entity should be disclosed when the value when aggregated with all other Financial Interests exceeds the $5,000 threshold. Any Equity in a privately-held Entity must be disclosed.

Intellectual Property

I have received $1000/month in licensing fees for the last 6 months from Pear Computers for a patent I currently hold. Does this need to be disclosed?

Answer:

Yes, you would disclose this Financial Interest because your income from this Entity in the previous 12 months exceeds the $5,000 SFI threshold.

You must disclose income related to any Intellectual Property if during the 12 months preceding the date of SFI Disclosure and/or you reasonably anticipate to be receive income in the 12 months following the date of SFI disclosure which, when aggregated with other Financial Interests (Compensation, Equity, Sponsored or Reimbursed travel) in the Entity, exceeds $5,000.

Intellectual Property is defined in GIM 10 as: the rights comprising a patent, trademark, copyright, trade secret, know-how or other similar intangible property right, including but not limited to, inventorship or authorship.