



## Potential Conflict of Interest Disclosure Form *(revised March 2015)*

Everyone engaged in research at Azusa Pacific University (see definition of *covered individual*) must complete the "Potential Conflict of Interest Disclosure Form" per the *Policy for Conflicts of Interest in Research* (the "Policy"). The form must be completed no later than the time of application for funded research (with the Grants Routing Form), or when a researcher is applying for IRB or IACUC approval, whichever is first, regardless of the source of research funding. If there are subsequent changes to any response, a new form must be filled out within 30 days. Based upon the information provided on this form, the university will determine, through the *Committee for Conflicts of Interest*, whether the researcher has any conflicts of interest. The full policy, including definitions of key terms (italicized on this form), may be found at [www.apu.edu/grants/policies](http://www.apu.edu/grants/policies). Questions about this form or the policy may be directed to Dr. Diane Guido, Research Integrity Officer, at [dguido@apu.edu](mailto:dguido@apu.edu) or (626) 812-3034.

Name: \_\_\_\_\_ Date: \_\_\_\_\_

Title of Proposed Research: \_\_\_\_\_

Potential or Secured Funding Source: \_\_\_\_\_

Submitted with:       Sponsored Research Routing Form       Annual Update (if PHS funded)  
                                  IRB or IACUC Proposal                                       Other (e.g., change of circumstances)

1. Do you have any *significant financial interest* (as defined in the *Policy*) that, to an independent observer, would reasonably appear to be affected by research in which you are involved or that exist in entities whose financial interests to an independent observer would reasonably appear to be affected by your research (e.g., stock values, etc.)?

Yourself: \_\_Yes \_\_ No                      Your spouse or dependent children: \_\_Yes \_\_No \_\_NA

2. Separate from *regular research payments* (as defined in the *Policy*), have you received in the last 12 months or will you receive in the next 12 months more than \$5,000 in cash or of monetary value from an entity that could reasonably appear to be affected by this research?

Yourself: \_\_Yes \_\_ No                      Your spouse or dependent children: \_\_Yes \_\_No \_\_NA

3. Do you consult or have a financial interest with any commercial funding source that also sponsors clinical trials or other research at the University in which you simultaneously are responsible for the design, conduct or reporting of the University project?

Yourself: \_\_Yes \_\_ No                      Your spouse or dependent children: \_\_Yes \_\_No \_\_NA

4. Do you serve as an officer, director, employee, or member of an advisory committee or review board of an organization (whether paid or unpaid) that is related to your research interest (or that could reasonably appear to be affected by your research)?

Yourself: \_\_Yes \_\_ No                      Your spouse or dependent children: \_\_Yes \_\_No \_\_NA

5. Would your school or academic department receive anything of value from any commercial funding source that sponsors your research (other than compensation disclosed in the budget submitted to the Office of Research and Grants with your grant proposal)?                      \_\_Yes \_\_No

6. Do you use or propose to use University facilities or personnel to conduct research or testing for any outside interests other than sponsored projects approved by the University? \_\_\_Yes \_\_\_No
7. Do you engage in external professional or commercial activities (e.g., external consulting) related to your research? \_\_\_Yes \_\_\_No
8. Did you receive any reimbursement for travel or sponsored travel related to your institutional responsibilities from an entity other than a federal, state, or local governmental 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? \_\_\_Yes \_\_\_No
9. Do you have a *conflict of interest* (as defined in the *Policy*) or the appearance of any *conflict of interest* (including bias) between your personal financial, relational, or other interest and your involvement in this research project? \_\_\_Yes \_\_\_No
10. Is there anything not covered in the above questions that you believe might constitute a potential conflict of interest or create the appearance of being a conflict of interest related to this research? \_\_\_Yes \_\_\_No

**If you answered “yes” to any question above (#1-10), attach a separate page describing the nature and amount of any interest noted and how you have mitigated (or plan to mitigate) any identified potential conflicts.**

Are you the Principal Investigator or are you responsible for the design and conduct of this research project?  
 \_\_\_Yes \_\_\_No

If yes, please identify faculty, staff, students, and other collaborators who will be working with you on this research project.

Name, Affiliation: \_\_\_\_\_  
 Name, Affiliation: \_\_\_\_\_  
 Name, Affiliation: \_\_\_\_\_  
 Name, Affiliation: \_\_\_\_\_

If any of the *covered individuals* listed above has IRB approval from another institution related to this study, please provide a copy of that IRB approval.

**I attest that I have disclosed any and all significant financial and other interests, as well as those of my spouse and children, which, to an independent observer might reasonably appear to affect or be affected by my research.**

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**Signature** **Department/Division** **Date**

**Submit this form with the Grant Routing Form to the Office of Research and Grants, or with the IRB and IACUC applications to the appropriate IRB/IACUC Coordinator for review.**

## Selected Definitions from the Policy for Conflicts of Interest in Research

For a complete copy of the policy, see [www.apu.edu/grants/policies](http://www.apu.edu/grants/policies) or contact Dr. Diane Guido, Research Integrity Officer, at [dguido@apu.edu](mailto:dguido@apu.edu) or (626) 812-3034.

**“Conflict of interest”** refers to a divergence between the individual’s personal financial, relational, or other interests and his/her professional obligations to the University – whether through teaching, involvement in research, contracting, purchasing, or performing other administrative duties – such that an independent observer might reasonably determine that the individual’s professional actions or decisions are, or potentially could be adversely affected, distorted or otherwise compromised by the individual’s personal interest. The term conflict of interest is broader and encompasses more professional activities than the term financial conflict of interest in research, defined below.

**“Covered individual”** includes any faculty member (whether full-, partially-, or non-salaried), staff member, administrator or other employee who, under the aegis of the University, is involved in research, or conducts research pursuant to the review and approval of a University research panel, or is otherwise identified as involved in research by a principal investigator, chair or unit head, or other University administrative officer responsible for research activities. It also includes any student, fellow, or trainee who works (whether paid or unpaid) on a federally funded research project as well as any student who is a primary investigator or co-investigator.

**“Significant financial interest”** means anything of economic or monetary value that to an independent observer would be or reasonably appear to be affected by research, with inclusions and exclusions as set forth below:

- (1) **Inclusions.** Significant financial interest includes, but is not limited to, any economic or monetary interest of the following types or categories that is held either i) by a covered individual (or his or her spouse or dependent children), or ii) by any entity in which a covered individual (or his or her spouse or dependent children) has a financial or fiduciary interest:
  - a) **“Compensation interest,”** meaning non-university salary, consulting fees, wages, retainers, honoraria (including honoraria from a third party, if the original source is a financially interested company), gifts, “in kind” compensation from a financially interested company (or entitlement to the same), or any other thing of economic or monetary value whether for consulting, lecturing, travel, service on an advisory board, or for any other purpose not directly related to the reasonable costs of conducting the research (as specified in the research agreement), that in the aggregate have in the past 12 months exceeded \$5,000, or are expected to exceed that amount in the next 12 months;
  - b) **“Equity interest,”** meaning i) any equity interest (or entitlement to the same), in a publicly-traded financially interested entity that exceeds \$5,000 in value or represents more than 5% ownership interest in any single entity (see exclusions below), or ii) equity interests, including stock options, warrants, or other convertible securities, of any amount in a non-publicly-traded financially interested entity (or entitlement to the same);
  - c) **“Intellectual property interest”** meaning i) royalty income or the right to receive future royalties under a patent license or copyright, whether the research is directly related to the licensed technology or work; or ii) any other direct or indirect interest in a patent, trademark, copyright, trade secret, know-how or other intellectual property right where the research is directly related to the interest;
  - d) **“Extraneous research payments,”** meaning any non-royalty payments or entitlements to payments in connection with the research that are not directly related to the reasonable costs of the research (as

specified in the research agreement between the sponsor and the institution), including any bonus or milestone payments to the investigators in excess of reasonable costs incurred, whether such payments are received from a financially interested *entity* or from the institution;

e) “*Fiduciary relationship*,” meaning service as an officer, director, or in any other fiduciary role for a financially interested entity, regardless of whether remuneration is received for such service.

f) “*Travel expense*,” meaning any reimbursed or sponsored travel (i.e., that which is paid on behalf of the Investigator and not reimbursed to the Investigator so that the exact monetary value may not be readily available), related to their institutional responsibilities; provided, however, that disclosure is not required for travel that is reimbursed or sponsored by 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.

(2) **Exclusions.** Significant financial interest excludes, and therefore is not meant to refer to, the following types of categories of economic or monetary interest:

a) “*Mutual fund interests and retirement accounts*,” meaning interests of any amount in publicly traded, diversified mutual funds or retirement funds as long as the Investigator does not directly control the investment decisions made by these vehicles;

b) “*De minimis equity interests*,” meaning stock or stock options in a publicly traded company that, when aggregated for the covered individual (and/or his or her spouse or dependent children) meets both the following tests: it does not exceed \$5,000 in value (as measured in reference to public prices or other reasonable measure of fair market value) and does not represent more than a 5% ownership interest in any single entity;

c) “*Outside payments*.” meaning salary, royalties, and other payments from entities other than the University, or via the University to the individual, that when aggregated for the covered individual (and/or his or her spouse or dependent children), over the next 12 months, are not expected to exceed \$5,000;

d) “*Regular research payments*,” meaning payments to the University, or via the University to the individual, that are directly related to reasonable costs incurred in the conduct of research as specified in the research agreement between the sponsor and the University;

e) “*University compensation*,” meaning salary, royalties, and other remuneration for services from the University;

f) “*Income from service*,” meaning income for service on advisory committees or review panels for 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;

g) “*Income from lectures*,” meaning income from seminars, lectures, or teaching engagements sponsored by 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.