

Conflicts of Interest

What to Disclose – Research/Scholarly/Supported Activities

Disclosure Requirements for Involvement in Research, Scholarly, &/or other Supported Activities

How & When to Disclose

The Attestation and Disclosure Form (ADF) is the means to disclose external activities related to an individual's institutional role(s). The ADF is available at <http://iris.louisville.edu>. Instructions for completing the form are available <http://louisville.edu/conflictinterest>. The ADF must be completed at least annually, or within 30 days of any change to your disclosure(s).

What to Disclose

External interests that are **related** to a covered individual's institutional role(s) (and activities) must be reported on the ADF. This includes, off campus, non-University commitments, such as lectures, speaker bureaus, or consulting activities for external entities.

The following external interests of a covered individual (or immediate family member) must be disclosed on the ADF for the past 12 months and the anticipated upcoming 12 months:

- Serving in a fiduciary role (officer, director, etc.), regardless of whether remuneration is received for a for-profit (public or private) or not-for-profit entity.
- Receiving remuneration in connection with a supported activity in excess of the amount specified in the agreement between the entity providing support and the institution. This includes any bonus or milestone payments to the investigators in excess of reasonable costs incurred.
- Receiving remuneration from any publicly traded entity and/or the value of any equity interest (excluding purchase of mutual funds) in the entity, when aggregated, exceeds \$5,000.
- Receiving any remuneration from any non-publicly traded entity.
- Holding any equity interest (e.g., stock, stock option, or other ownership interest); Intellectual property rights (e.g., patents, copyrights), royalties from such rights, and agreements to share in royalties related to such rights.
- Anything of value ("gift") greater than \$25 per year from an outside organization that provides good, services, and/or funds to the university or associated organization (ULAA, ULF, ULRF). Examples include: Free meals, discounted items, gift cards, free tickets to entertainment events, software, or other tangible items.

What is Exempt from Disclosure

- Receiving income from a federal, state or local government agency, a domestic Institution of higher education, a domestic academic teaching hospital, a domestic medical center, or a research institute that is affiliated with a domestic Institution of higher education for any of the following activities: seminars, lectures, teaching engagements, or serving as a special reviewer or on a review panel.
- Receiving royalties under the University's royalty-sharing policy. **DO DISCLOSE** if any other relationship with the royalty-granting entity could result in a potential or perceived conflict of interest.
- Ownership of Mutual Funds, of any amount.
- Salary, royalties, or other remuneration paid by the University or associated organization (ULAA, ULF, ULRF), if the individual is currently employed or otherwise appointed by the University or associated organization.
- Receiving travel, lodging and/or per diem expense for meals as required per University work assignments for serving on (federal, state, local) peer-review panels or research agencies.

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External Interests to Disclose	Annual Threshold	Excluded from Disclosure
Serving in a fiduciary role for an entity (officer/director/etc) <i>Includes for-profit & not-for-profit entities</i>	\$0	Holding a membership-only relationship in a not-for-profit entity
Receiving <u>additional</u> remuneration in connection with a supported activity <i>Includes bonus or milestone payments in excess of reasonable costs incurred</i>	\$0	External funding that is specified in an agreement between the entity providing support and the institution. (ie- Funded awards through UofL)
Holding a faculty position at another institution (foreign or domestic)	\$0	Receiving income from a federal, state or local government agency or a domestic Institution of higher education (including affiliated teaching hospitals, medical centers, or research institutes) for any of the following activities: seminars, lectures, teaching engagements, or serving as a special reviewer or on a review panel.
Receiving remuneration from any publicly traded entity and/or the value of any equity interest in the public entity	≥\$5,000	Ownership of Mutual Funds, of any amount.
Receiving remuneration from any non-publicly traded entity (Private Entity)	\$0	Salary, royalties, or other remuneration paid by the University or associated organization (ULAA, ULF, ULRF), if the individual is currently employed or otherwise appointed by the University or associated organization.
Holding equity interest in any non-publicly traded entity (e.g., stock, stock option, or other ownership interest)	\$0	---
Spouse or Dependent Child holding equity interest in any non-publicly traded entity (e.g., stock, stock option, or other ownership interest)	\$0	---
Intellectual property rights (patents/copyrights), royalties from such rights, or agreements to share in royalties related to such rights	\$0	Receiving royalties under the University's royalty-sharing policy unless there is any other relationship with the royalty-granting entity that could result in a conflict of interest.
Sponsored or reimbursed travel from a single external entity	≥\$5,000	Receiving travel, lodging and/or per diem expense for meals as required per University work assignments for serving on (federal, state, local) peer-review panels or research agencies.
Gift(s) (anything of value) from an external entity that provides good, services, and/or funds to the university or associated organization (ULAA, ULF, ULRF) (e.g., meals, tickets, etc.)	≥\$25	Discounts received through the employee benefits programs. Items related to direct sponsor provided travel should be disclosed on the travel form.

Additional information on COI's, including FAQ's, policies, and disclosing requirements is available on the COI Program website or contact us directly.