

SIUC Disclosure Matrix

Note: This matrix is for informational purposes only and provides a general guide for disclosing outside appointments, activities, financial conflicts of interest, and other commitments and may not address every situation. Disclosure obligations may change based on sponsor or agency requirements, applicable law, institutional policy, or other guidance and may not be reflected in this matrix. This matrix does not constitute legal advice. Investigators remain individually responsible for making all required disclosures and should contact the appropriate institutional office with questions.

Activity, Relationship, Commitment, or Interest Requiring Disclosure	Location for Disclosure				
	Southern Illinois University Carbondale				U.S. Federal Agencies (when applying for or supported by a Federal Grant agency)
	System Ethics Office	System Export Control	SIUC FCOI Disclosure Form	SIUC COI/C Disclosure Form	
APPOINTMENTS & POSITIONS					
Appointments, affiliations, and employment outside of SIU including, academic, professional, or institutional appointments, and positions, whether or not remuneration is received, and whether full-time, part-time, or voluntary.	YES, if required to complete the annual statement of economic interest filing (if the individual meets criteria)	YES, but only if it is outside of the United States	YES, when FCOI criteria or thresholds apply	Yes, when applicable per University policy.	Yes - BioSketch
AWARDS & PROPOSALS					
Active awards and pending proposals received and managed by external entities (including non-U.S. entities).			Possibly, contact ORC for guidance		Yes – Other Support / Current & Pending
Previous research support (both financial and in-kind) for projects with award period of performance ending within the past 5 years.					Yes – DoD only
RESOURCES & SUPPORT					
All resources made available, or expected to be made available, to an individual in support of the individual’s research and development efforts, regardless of (i) whether the source is foreign or domestic; (ii) whether the resource is made available through the entity applying for a research and development award or directly to the individual; or (iii) whether the resource has monetary value; and (b) includes in-kind contributions			YES, if resources are from an external entity and meet FCOI reporting criteria	Yes, if the financial compensation, including in-kind, violates any laws, rules, or executive orders of the state of Illinois or federal government	Yes – Other Support / Current & Pending; RPPR ¹ ; Post-Award Disclosure and/or JIT Request ²

1 = For New Support Only

2 = If undisclosed at the time of application submission

3= Appropriate placement may be contract dependent

Activity, Relationship, Commitment, or Interest Requiring Disclosure	Location for Disclosure				
	Southern Illinois University Carbondale				U.S. Federal Agencies (when applying for or supported by a Federal Grant agency)
	System Ethics Office	System Export Control	SIUC FCOI Disclosure Form	SIUC COI/C Disclosure Form	
requiring a commitment of time and directly supporting the individual's research and development efforts, such as the provision of office or laboratory space, equipment, supplies, employees, or students. (EXCLUDES SIU START-UP PACKAGES).				(including the State Officials and Employees Ethics Act)	
In-kind (i.e., non-monetary) support being used in the proposed project (e.g., office/laboratory space, equipment, supplies, or employees or students/mentees supported by an outside source, provision of high-value materials that are not freely available).			Possibly, contact ORC for guidance	Yes, if the financial compensation, including in-kind, violates any laws, rules, or executive orders of the state of Illinois or federal government (including the State Officials and Employees Ethics Act)	Yes – Facilities, Equipment, and Other Resources
In-kind (i.e., non-monetary) support not used in the proposed project (e.g., employees or students/mentees supported by an outside source, office/laboratory space, equipment, supplies, provision of high-value materials that are not freely available).			Possibly, contact ORC for guidance	Yes, if the financial compensation, including in-kind, violates any laws, rules, or executive orders of the state of Illinois or federal government (including the State Officials and Employees Ethics Act)	Yes – Other Support / Current & Pending; RPPR ¹ ; Post-Award Disclosure and/or JIT Request ²
Startup packages from other than the proposing organization.			YES		Yes – Other Support / Current & Pending; RPPR ¹ ; Post-Award

1 = For New Support Only

2 = If undisclosed at the time of application submission

3= Appropriate placement may be contract dependent

Activity, Relationship, Commitment, or Interest Requiring Disclosure	Location for Disclosure				
	Southern Illinois University Carbondale				U.S. Federal Agencies (when applying for or supported by a Federal Grant agency)
	System Ethics Office	System Export Control	SIUC FCOI Disclosure Form	SIUC COI/C Disclosure Form	
					Disclosure and/or JIT Request ²
CONSULTING & EXTERNAL ENGAGEMENTS					
Consulting activities under the proposals and active projects section of the form when any of the following scenarios apply: (i) the consulting activity will require the senior/key person to perform research as part of the consulting activity; (ii) the consulting activity does not involve performing research, but is related to the senior/key person's research portfolio and may have the ability to impact funding, alter time or effort commitments, or otherwise impact scientific integrity; or (iii) the consulting entity has provided a contract that requires the senior/key person to conceal or withhold confidential financial or other ties between the senior/key person and the entity, irrespective of the duration of the engagement		YES, but only if it is outside of the United States	YES	Yes, when applicable per University policy.	Yes – Other Support / Current & Pending
Honoraria	Proceed with caution, if honoraria is a gift from a prohibited source, this is not allowed per the Ethics Act	YES, but only if it is outside of the United States	YES, excluding honoraria received from SIU, another U.S. University, U.S. Government entity, or U.S. academic affiliated hospital		Yes – NIH only, if in, support of research endeavors
Remuneration (including salary or any payment for services not otherwise identified as salary, such as consulting fees, or paid authorship) received in the last 12 months	Proceed with caution, if honoraria is a gift from a prohibited source, this is not allowed per the Ethics Act	YES, but only if it is from outside of the United States	YES, excluding remuneration or honoraria received from SIU, another U.S. University, or U.S. Government or U.S. academic affiliated hospital	YES	

1 = For New Support Only

2 = If undisclosed at the time of application submission

3= Appropriate placement may be contract dependent

Activity, Relationship, Commitment, or Interest Requiring Disclosure	Location for Disclosure				
	Southern Illinois University Carbondale				U.S. Federal Agencies (when applying for or supported by a Federal Grant agency)
	System Ethics Office	System Export Control	SIUC FCOI Disclosure Form	SIUC COI/C Disclosure Form	
PERSONNEL SUPPORT (EXTERNALLY FUNDED)					
Outside financial support for laboratory personnel (employees, post-docs, students, or visiting scholars who receive funding or salary from a government, other institution, or outside entity) and whose research activities are intended for use on the project/proposal being proposed	Yes, if a prohibited source, reimbursed travel requires pre-approval from SIU Ethics Officer.	YES, but only if it is from outside of the United States.	The Individual receiving funding must report on their FCOI disclosure, following FCOI disclosure guidelines		Yes
Outside financial support for laboratory personnel (employees, post-docs, students or visiting scholars who receive funding or salary from a government, other institution, or outside entity) and whose research activities are not intended for use on the project/proposal being proposed and have an associated time commitment	Yes, if a prohibited source, reimbursed travel requires pre-approval from SIU Ethics Officer.	YES, but only if it is from outside of the United States			Yes – Other Support / Current & Pending; RPPR ¹ ; Post-Award Disclosure and/or JIT Request ²
TRAVEL (SPONSORED/REIMBURSED)					
Travel that is supported, funded, or reimbursed by an external entity for professional or research-related activities, including airfare, transportation, lodging, meals, stipends, or other forms of support	YES, if a prohibited source, reimbursed travel requires pre-approval from SIU Ethics Officer.	YES, but only if it is from outside of the United States	YES, regardless of value		Yes – Other Support / Current & Pending; RPPR ¹ ; Post-Award Disclosure and/or JIT Request ²
SIU related international travel to any country outside of the United States	YES, if a prohibited source, reimburses travel, requires pre-approval from SIU Ethics Officer.	Submit in the SIU International Travel Registry for approval	YES, if travel is sponsored or reimbursed by other than SIU, another U.S. University, or U.S. Government or U.S. academic affiliated hospital		

1 = For New Support Only

2 = If undisclosed at the time of application submission

3= Appropriate placement may be contract dependent

Activity, Relationship, Commitment, or Interest Requiring Disclosure	Location for Disclosure				
	Southern Illinois University Carbondale				U.S. Federal Agencies (when applying for or supported by a Federal Grant agency)
	System Ethics Office	System Export Control	SIUC FCOI Disclosure Form	SIUC COI/C Disclosure Form	
Plan to attend a virtual conference that hosted outside of the United States		YES			
EQUITY, OWNERSHIP, & IP INTERESTS					
Interest in a publicly traded entity (excluding passive investments where you do not directly influence investment decisions) held within the last 12 months	YES, if required to complete the annual statement of economic interest filing (if the individual meets criteria).	YES, but only if it is from outside of the United States	YES, if amount is over \$5,000		Disclosure may be necessary, depending on the sponsor's requirements.
Equity or other ownership interest in a non-publicly traded entity (e.g., stock, option(s), or other ownership interest) held within the last 12 months	YES, if required to complete the annual statement of economic interest filing (if the individual meets criteria).	YES, but only if it is from outside of the United States	YES, regardless of value		Disclosure may be necessary, depending on the sponsor's requirements.
Income related to intellectual property rights or interests (e.g., patents and copyrights)	YES, if required to complete the annual statement of economic interest filing (if the individual meets criteria).	YES, but only if it is from outside of the United States	YES, excluding rights assigned to/by SIUC		
Startup company based on nonorganizational-licensed IP	YES, if required to complete the annual statement of economic interest filing (if the individual meets criteria).	YES, but only if it is from outside of the United States	YES		Yes – Other Support / Current & Pending; RPPR ¹ ; Post-Award Disclosure and/or JIT Request ²
FOREIGN RELATIONSHIPS OR ACTIVITIES					

1 = For New Support Only

2 = If undisclosed at the time of application submission

3= Appropriate placement may be contract dependent

Activity, Relationship, Commitment, or Interest Requiring Disclosure	Location for Disclosure				
	Southern Illinois University Carbondale				U.S. Federal Agencies (when applying for or supported by a Federal Grant agency)
	System Ethics Office	System Export Control	SIUC FCOI Disclosure Form	SIUC COI/C Disclosure Form	
Participation (current, pending, or negotiated) in any foreign talent recruitment programs or activities sponsored by a foreign government, foreign institutions of higher education, academic medical centers, teaching hospitals, instrumentalities, or other foreign entities.		YES	YES		Yes ³ – Other Support / Current & Pending; RPPR; Post-Award Disclosure and/or JIT Request
Plan to collaborate or interact with any entity not in the United States		YES			
Plan to bring anyone from outside of the United States onto the SIU campus		YES			
Plan to ship any item outside of the United States		YES			
Remuneration, gifts, or in-kind support, received in the last 12 months from a foreign institution of higher education, foreign academic teaching hospital, and/or the government of a foreign country (which includes local, provincial, or equivalent governments of another company)	Proceed with caution, the Ethics Act prohibits gifts unless an exception is met.	YES	YES, regardless of amount		
OTHER					
If you receive notice requiring that you file a statement of economic interest, additional disclosures are required to be filed with the Illinois Secretary of State and the Executive Ethics Commission.	Employees required to complete the economic interest form will be notified in March each year. Statement of Economic Interests forms are required to be completed annually by employees meeting certain criteria as mandated in the Illinois Governmental Ethics Act (5 ILCS 420). https://siusystem.edu/ethics/statement-of-economic-interests.shtml				
SIU School of Medicine (SOM)	Carbondale-based School of Medicine employees have additional disclosure requirements through SOM. For additional information contact compilance@siumed.edu .				
Procurement	Any real or apparent conflict of interest involving the selection, purchase or contracting of goods or services must be disclosed and managed in accordance with the Procurement Conflict of Interest Policy. For additional information see https://procurement.siu.edu/how-to/conflicts.php				

1 = For New Support Only

2 = If undisclosed at the time of application submission

3= Appropriate placement may be contract dependent