



Financial Interest on Grants Disclosure Statement

When mandated by the granting agency or SIUC policy, investigators must complete this form prior to the submission of a proposal for external research support and annually throughout the life of the funded project. Within 30 days, investigators must submit an updated form if any answers to the disclosure questions change.

All investigators involved in the funded project, including key personnel and staff responsible for the design, conduct, and reporting of project activities, must complete this form. This requirement applies to both existing staff whose roles change and new investigators joining the project. Please answer **all** questions. Do not leave any question blank. Once completed, return the form to OSPA.

☐ Initial Disclosure ☐ Annual/Updated Disclosure (Proposal/BP Number _____)

Name: _____ School/Unit: _____

College: _____ Email: _____

Title/Position: _____ Campus Phone: _____

Lead SIUC Principal Investigator on Project: _____

Funding Agency: _____ Proposal Deadline: _____

Proposal Title:

Investigators must complete training on **Conflicts of Interest (COI)**, **Responsible Conduct of Research (RCR)**, and **Research Security (RST)**, when required. COI and RCR Training are valid for four years. RST is valid for 12 months. Information on accessing the appropriate training is available through the Office of Research Compliance [website](#). Training courses are offered through CITI and should be supplemented with in-person activities. PIs are responsible for ensuring all individuals supported on a grant have the appropriate training.

Enter your training completion dates below:

RCR Completion Date: _____ COI Completion Date: _____ RST Completion Date: _____

This Financial Interest on Grants Disclosure Statement is to be completed in compliance with [SIUC's Financial Conflict of Interest on Federal Grants Policy](#). Please note, answering “yes” to any of the following questions does not mean the financial interest is inappropriate or improper, it means only that disclosure and evaluation, and in some cases, approval and oversight, are required. All thresholds listed below are an aggregate for the investigator, their spouse or legally recognized civil union/domestic partner (as evidenced by certification/registration issued by a civil authority), and dependent children. These questions apply to entities that are or could reasonably appear to be related to the proposed research.

Investigators must make a reasonable, good-faith determination as to whether their research or other Institutional Responsibilities could affect the value of a financial interest or have a financial impact on the Entity in which they hold a financial interest. It is the responsibility of the investigator to disclose completely and accurately. If you are unsure whether an interest or activity requires disclosure, it is your responsibility to discuss the potential disclosure with the Office of Research Compliance or other appropriate office.

Significant Financial Interests in **Publicly** Traded Entities

(1) Do you, your spouse or legally recognized civil union/domestic partner (as evidenced by certification/registration issued by a civil authority), or your dependent children have any of the following interests in a **publicly traded** entity, that alone or when aggregated, exceeds \$5,000 and that is or reasonably appears to be related to your institutional responsibilities at SIUC?

- Remuneration (including salary or any payment for services not otherwise identified as salary, such as consulting fees, honoraria, or paid authorship) received in the last 12 months (excluding salary, royalties, or other remuneration paid by SIU while an SIU employee and income from lectures, workshops, panels, etc., for U.S. universities and U.S. state, local, or federal agencies).
- Equity interest (stock, stock options, or other ownership interest, excluding “passive” investments where you do not directly influence investment decisions, such as mutual funds or retirement accounts).

Yes ☐ No ☐

If you answered Yes to question 3, please provide additional details, including (a) name of the outside entity, (b) nature of the activity for which remuneration was received, (c) amount of remuneration received over the last 12 months, (d) value of any equity interest as of the date of this disclosure (as determined through reference to public prices or other reasonable measures of fair market value), (e) percentage of ownership interest in the outside entity, and (f) the manner in which the equity interest was acquired.

Significant Financial Interests in **Non-Publicly** Traded Entities

(2) Have you, your spouse or legally recognized civil union/domestic partner (as evidenced by certification/registration issued by a civil authority), or your dependent children received from a **non- publicly** traded entity over the last 12 months any remuneration (such as consulting fees, honoraria, or paid authorship) that alone, or when aggregated, exceeds \$5,000 and that is or reasonably appears to be related to your Institutional Responsibilities at SIUC? (A non-publicly traded entity may be for-profit, non-profit, or governmental, but does not include SIUC.)

Yes ☐ No ☐

If so, please provide details, including (a) name of the outside entity, (b) nature of the activity for which payment was received, and (c) amount of the remuneration received over the last 12 months.

- (3) Do you, your spouse or legally recognized civil union/domestic partner (as evidenced by certification/registration issued by a civil authority), or your dependent children hold, in a **non-publicly** traded entity (including an SBIR or STTR), any equity interest (e.g., stock, stock option(s), or other ownership interest), regardless of value, that is or reasonably appears to be related to your Institutional Responsibilities at SIUC?

Yes ☐ No ☐

If so, please provide details, including (a) name of the outside entity, (b) dollar value and percentage of ownership interest in the outside entity, and (c) manner in which the equity interest was acquired.

Note: If you are reporting equity interest in a non-public entity, further disclosure identifying the source of any venture and/or other capital financing in the disclosed entity, including the names of the individuals, venture capital firms, and/or other investors may be requested.

Intellectual Property Rights

- (4) Do you, your spouse or legally recognized civil union/domestic partner (as evidenced by certification/registration issued by a civil authority), or your dependent children have any intellectual property rights or interests (e.g., patents and copyrights) from which you or they have received any related income in the last 12 months that are or reasonably appear to be related to your Institutional Responsibilities at SIUC? (Please note this question applies regardless of the value of the income received. You need not disclose intellectual property rights assigned to SIUC and agreements to share in royalties related to such rights.)

Yes ☐ No ☐

If so, please provide details, including (a) the nature of the intellectual property rights and interests, (b) how they were acquired, and (c) the amount of income received.

Reimbursed or Sponsored Travel

- (5) Have you received reimbursement or sponsored travel, regardless of value, in the last 12 months and that is or reasonably appears to be related to your Institutional Responsibilities at SIUC. (You need not disclose travel that is reimbursed or sponsored by SIUC, a U.S. Federal, state, or local government agency, a U.S. institution of higher education, a U.S. academic teaching hospital, a U.S. medical center, or a U.S. research institute that is affiliated with an institution of higher education.)

Yes ☐ No ☐

If so, list (a) purpose of the trip, (b) name of the organization that reimbursed or sponsored the travel, (c) destination of the trip, (d) trip duration.

Significant Foreign Financial Interests

The following definitions apply to significant foreign financial interests:

A **Foreign Talent Recruitment Program** means any program sponsored by, or benefit offered (whether in the form of remuneration or in-kind support) by a foreign researcher, foreign government (at any level), foreign institution, or foreign government-controlled entity for the purpose of facilitating the transfer or acquisition of expertise, technical know-how, research results/data/designs, or technology. These programs may involve entering into a contract with a foreign institution or entity and may be accompanied by an honorary, adjunct, or temporary appointment.

A **Malign Foreign Talent Program**, as defined by Section 10638(4) of the Chips and Science Act of 2022, means:

- (A) Any program, position, or activity that includes compensation in the form of cash, in-kind compensation, including research funding, promised future compensation, complimentary foreign travel, things of non de minimis value, honorific titles, career advancement opportunities, or other types of remuneration or consideration directly provided by a foreign country at any level (national, provincial, or local) or their designee, or an entity based in, funded by, or affiliated with a foreign country, whether or not directly sponsored by the foreign country, to the targeted individual, whether directly or indirectly stated in the arrangement, contract, or other documentation at issue, in exchange for the individual:
- i. Engaging in the unauthorized transfer of intellectual property, materials, data products, or other nonpublic information owned by a United States entity or developed with a federal research and development award to the government of a foreign country or an entity based in, funded by, or affiliated with a foreign country regardless of whether that government or entity provided support for the development of the intellectual property, materials, or data products;
 - ii. Being required to recruit trainees or researchers to enroll in such program, position, or activity;

- iii. Establishing a laboratory or company, accepting a faculty position, or undertaking any other employment or appointment in a foreign country or with an entity based in, funded by, or affiliated with a foreign country if such activities are in violation of the standard terms and conditions of a Federal research and development award;
- iv. Being unable to terminate the foreign talent recruitment program contract or agreement except in extraordinary circumstances;
- v. Through funding or effort related to the foreign talent recruitment program, being limited in the capacity to carry out a research and development award or required to engage in work that would result in substantial overlap or duplication with a Federal research and development award;
- vi. Being required to apply for and successfully receive funding from the sponsoring foreign government's funding agencies with the sponsoring foreign organization as the recipient;
- vii. being required to omit acknowledgment of the recipient institution with which the individual is affiliated, or the Federal research agency sponsoring the research and development award, contrary to the institutional policies or standard terms and conditions of the Federal research and development award;
- viii. being required to not disclose to the Federal research agency or employing institution the participation of such individual in such program, position, or activity; or
- ix. having a conflict of interest or conflict of commitment contrary to the standard terms and conditions of the Federal research and development award; and

(B) A program that is sponsored by:

- (i) A foreign country of concern or an entity based in a foreign country of concern, whether or not directly sponsored by the foreign country of concern;
- (ii) an academic institution on the list developed under section 1286(c)(8) of the John S. McCain National Defense Authorization Act for Fiscal Year 2019 (10 U.S.C. 4001 note; Public Law 115-232); or,
- (iii) A foreign talent recruitment program on the list developed under section 1286(c)(9) of the John S. McCain National Defense Authorization Act for Fiscal Year 2019 (10 U.S.C. 4001 note; Public Law 115-232).

The following **are not** considered malign foreign talent programs:

- (i) Making scholarly presentations and publishing written materials regarding scientific information not otherwise controlled under current law;
- (ii) participation in international conferences or other international exchanges, research projects, or programs that involve open and reciprocal exchange of scientific information, and which are aimed at advancing international scientific understanding and not otherwise controlled under current law;

(iii) advising a foreign student enrolled at an institution of higher education or writing a recommendation for such a student, at such student's request.

- (6) Have you received in the last 12 months any remuneration, gift, or in-kind support, regardless of amount or value, 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)?

Yes ☐ No ☐

- (7) Have you negotiated participation or participated in a Foreign Talent Recruitment Program by a foreign institution of higher education, foreign academic teaching hospital, and/or the government, at any level, of a foreign country?

Yes ☐ No ☐

If you answered Yes to question 6 or 7, please provide additional details, including (a) identity of the foreign entity, (b) your relationship to it, and (c) approximate value of any remuneration and/or in-kind support received.

Other Financial Interests

- (8) Have you received, or do you receive **anything** of monetary value (regardless of the value's amount) NOT previously listed on this form that would reasonably appear to be affected by the proposed research or educational activities or that are in, or paid by, entities whose financial interests would reasonably appear to be affected by such research or educational activities? (excluding salary, royalties or other remuneration from SIU and/or income from lectures, seminars, review panels, advisory committees or teaching engagements sponsored by U.S. public or non-profit entities). As used in this section, "you" refers to you **and** your spouse or legally recognized civil union/domestic partner (as evidenced by certification/registration issued by a civil authority) **and** your dependent children.

Yes ☐ No ☐

If you answered Yes, please provide additional details, including without limitation (a) the entity or person providing the item of monetary value, (b) your relationship to that person or entity, (c) the items you received or are receiving; and (d) the approximate monetary value of those items.

Investigator Statement

I have read and understood [SIUC's Financial Conflict of Interest on Federal Grants Policy](#). I acknowledge that during the period of the funded award, I am required to update this form annually, within 30 days of discovering or acquiring a new Significant Financial Interest, will submit a proposal for a Conflict of Interest Management Plan if necessary, and will comply with any conditions or restrictions imposed by the University to eliminate, reduce, or manage conflicts of interest regarding my research. I understand that failure to disclose a financial interest could result in loss of funding, termination, and/or prosecution by law.

I certify that I am not party to a “malign foreign talent recruitment program,” as that term is defined in this form above.

I understand that this Disclosure is required to obtain funding from the U.S. Government. I, _____, certify to the best of my knowledge and belief that the information contained in this Disclosure Statement is true, complete, and accurate. I understand that any false, fictitious, or fraudulent information, misrepresentations, half-truths, or omissions of any material fact, may subject me to criminal, civil or administrative penalties for fraud, false statements, false claims, or otherwise (18 U.S.C. §§ 1001 and 287, and 31 U.S.C. 3729-3730 and 3801-3812). I further understand and agree that (1) the statements and representations made herein are material to U.S. Government’s funding decision, and (2) I have a responsibility to update the disclosures during the period of performance of the award should circumstances change which impact the responses provided above.

Investigator Signature: _____ Date: _____

FOR OSPA PRE-AWARD USE ONLY

Date Received: _____

Pend # _____ Forwarded to Research Compliance: _____

FOR RESEARCH COMPLIANCE USE ONLY

Date Received: _____

FCOI Committee Review Yes ☐ No ☐

Comments: