

Frequently Asked Questions

1. How do I know if I have to submit an annual disclosure form?

All individuals *involved in research*, regardless of the presence of/source of funding, must submit an annual disclosure form. You are considered to be *involved in research* if your name is listed in the personnel section of a UI Proposal Routing Form OR if your name is listed on an application to the Institutional Review Board (IRB).

2. Whose name should be listed on a UI Proposal Routing Form?

The following individuals should be listed on a Routing Form:

- Principal Investigator – individual(s) who lead the project, assuming responsibility for the project’s fiscal management and/or academic progress.
- Co-Investigator(s) - individual(s) who collaborate with the PI(s) in the development or execution of the project, contributing a measurable effort to advance the project goals, whether the project budget includes salary for the individual or not.
- Other Key Personnel – individual(s) who have the authority to make independent decisions about the direction of the research and the subsequent conclusions about the results. Also includes individuals who are likely to be authors on manuscripts or to present research findings at national conferences. **Do not include** administrative personnel or individuals who perform routine, pre-defined, or incidental tasks related to the project.

3. What must be disclosed?

You must disclose anything of monetary value that belongs to you, your spouse and/or your dependent children *that is related to your University responsibilities*. This includes:

- Stock or other equity interest in a publicly-traded company in which you directly control the investment decisions
- Income from a publicly-traded company
- Stock or other equity/ownership interest in a private company
- Income from a private company
- Licensing or royalty income related to your inventions or copyrights that is paid to you by an entity other than the University of Iowa
- Certain reimbursed or sponsored travel (see **FAQ #10**)

4. Do I have to disclose payments from another university?

You do not have to disclose income from seminars, lectures, or teaching engagements sponsored by an institution of higher education, academic teaching hospitals, or research institutes affiliated with institutions of higher education. However, you do have to disclose income related to intellectual property rights (patents, copyrights, etc.) from a non-UI university.

5. What are *University responsibilities*?

University responsibilities are your professional obligations carried out on behalf of the University, involving your expertise. Examples include activities such as research, research

consultation, teaching, professional practice (e.g., providing patient care, accounting services, legal counsel), participation in purchasing decisions, evaluating products or services on behalf of the University, University committee memberships, and service on panels such as an Institutional Review Board or Data and Safety Monitoring Board.

6. What does *ownership interest* mean?

Ownership interest means any stock, stock options, or other ownership in a company that is either publicly-traded (stock is available for purchase by the general public) or non-publicly traded (privately held, such as a start-up company).

7. Do I have to disclose stock holdings such as my TIAA-CREF account or my mutual funds?

No. You don't have to disclose your investments, such as mutual funds or retirement accounts, as long as you do not directly control the investment decisions.

8. When I submit a disclosure form to the University, do I need to include payments made to me by the University?

No. Salary, royalties, or other remuneration from the University is not included. Salary support provided as part of a research grant or contract does not have to be disclosed.

9. What about payments to my spouse and dependent children from outside entities and ownership interests that they hold in outside entities? Must these be disclosed?

If the outside entities are related to your University responsibilities, then as an individual involved in research at the University, you must disclose these financial interests.

10. Do I need to disclose all reimbursed or sponsored travel?

Yes. You are required to disclose the occurrence of any professional travel where your expenses are either paid out-of-pocket (and then reimbursed by a non-UI entity) or paid directly by the non-UI entity to the airline, hotel, etc. If you are involved in research funded by the Public Health Service, you will need to provide additional details about your travel, including the number of days, estimated amount of travel expenses, and the destinations. This includes travel reimbursed or sponsored by a non-profit entity such as a professional association.

However, disclosure does not apply to travel that is reimbursed or sponsored by the following types of organizations:

- a federal, state or local government agency
- an outside institution of higher education
- an outside academic teaching hospital
- an outside medical center
- a research institute that is affiliated with an institution of higher education

Finally, travel that is required as a part of a research project, such as to attend an investigators' meeting, is not required to be disclosed.

11. I am involved in research that receives pass-through funding (for example, funding from the National Institutes of Health to another university, then to the University of Iowa.) Does this policy apply to me?

Yes, in this scenario you are considered to be involved in NIH-funded research. You must submit an annual disclosure form of all of your and your family's financial interests related to your University responsibilities.

12. I am a student/trainee (graduate student or post-doctoral fellow). How does this policy affect me?

If you are involved in research (see **FAQ #1**), then you need to submit an annual disclosure. Also, if your mentor (laboratory director, thesis advisor, etc.) has a conflict of interest related to research in which you participate, you will be informed in writing of your mentor's conflict of interest.

13. My management plan says that it is "subject to monitoring." What does this mean?

All management plans issued by the Office of the Vice President for Research are subject to monitoring. This means you could be contacted annually and asked to provide documentation of your compliance with the management plan. Therefore, it's important that you retain copies of conflict of interest statements submitted to journal editors or meeting organizers.

14. What happens if my financial interests change during the period of the research award?

You have an ongoing obligation to disclose financial interests throughout the year. You must update your disclosure within thirty (30) days of a change in previously-disclosed financial interests or the occurrence of/discovery of a new financial interest.