

Definitions and Exclusions

Investigators who are planning to participate in PHS-funded research must disclose their Significant Financial Interests (SFIs) over the previous twelve-month period to their Institution no later than at the time of application for PHS-funded research. Annual disclosure (and updated disclosure for changes in financial interest during the year) is required after an award is granted.

Remuneration – Any salary or payment for services (e.g., consulting fees, authorship fees, honoraria) that reasonably appears to be related to your institutional responsibilities, whether or not it is related to the research.

Exclusions: You do not have to disclose:

- a) Salary or royalties paid by WHOI if the recipient is currently employed or otherwise appointed by WHOI.
- b) Income from lectures, seminars, teaching engagements or service on advisory committees or review panels sponsored by Federal, state or local government agency, an institution of higher learning, a research institute that is affiliated with an institution of higher learning, or academic teaching hospital or medical center.
- c) If remuneration is from a *publicly-traded* entity and, aggregated with equity interest (see below) from a publicly traded entity, is less than \$5000.

Reimbursed or sponsored travel- travel related to your institutional responsibilities paid on your behalf (or on behalf of your spouse or dependent children) and not reimbursed so that the monetary value may not be readily available.

Exclusions: You do not have to disclose:

- a) Travel expenses that are reimbursed or sponsored by a Federal, state, or local government agency, an institution of higher education, a research institute that is affiliated with an institution of higher learning, a medical center or an academic teaching hospital.
- b) Travel expenses that are less than \$5000 aggregated per entity.

Equity interests – Stock, stock options or other ownership interests in any *publicly or non-publicly* traded entities that reasonably appear to be related to your institutional responsibilities, whether related to the research or not.

Exclusions: You do not have to disclose:

- a) Interests in a *publicly-traded* entity that have an aggregated total with remunerations (see above) in the past 12 months less than \$5000, based on public prices or other fair market value.
- b) Income from investment vehicles such as mutual funds and retirement accounts, when you, your spouse or dependent children do not directly control the investment decisions in these vehicles.

Royalties and Income related to Intellectual Property - Royalties or other income related to intellectual property and interests (patents, copyrights).

Exclusions: You do not have to disclose:

- a) Intellectual property rights assigned to WHOI and agreements to share in royalties related to such rights (e.g., royalties received under the relevant WHOI Patent Policy).
- b) If any of the following are less than \$5000: (i.) Interests in licensed intellectual property rights (e.g. patents, copyright) (ii.) royalties from such rights, and (iii) agreements to share in royalties related to licensed intellectual property rights.

Sources:

WHOI addendum PHS financial interest policy (link to be added)

<http://www.who.edu/DoR/policies-resources/policies-procedures>

NIH rules and regulations <http://grants.nih.gov/grants/policy/coi/>