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**DEANS AND DIRECTORS, ASSOCIATE DEANS, ASSISTANT DEANS FOR STUDENTS AND ADMINISTRATION, DEPARTMENT CHAIRS, DIRECTORS OF RESEARCH CENTERS, PROFESSORS/RESEARCHERS AND OTHER RESEARCH PERSONNEL**

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Chancellor

**NORMS AND PROCEDURES FOR MANAGING FINANCIAL CONFLICT OF INTEREST AND COMMITMENTS IN SPONSORED AND NON-SPONSORED RESEARCH AT UNIVERSITY OF PUERTO RICO, RÍO PIEDRAS CAMPUS**

The Board of Trustees has revised Certification 63, 2007-2008, JS: "*Policy on Conflict of Interest and Disclosure of Financial Interest in Research and Other Sponsored Programs of the University of Puerto Rico*" according to new federal regulations on the subject and to account for the increased level of research at the University of Puerto Rico. To that effect, the Board of Trustees issued Certification 8, 2012-2013: "*Policy and Guidelines for Financial Conflict of Interest and Commitments in Research and Sponsored Programs of the University of Puerto Rico*". The intention of Certification 8 is to ensure that any sponsored and non-sponsored research conducted at the University of Puerto Rico is bias free from any conflict of interest, whether financial or of other nature, on the part of the researcher or involved personnel.

The following *Norms and Procedures for Managing Financial Conflict of Interest and Commitments in Sponsored and Non-Sponsored Research* are issued to inform about and to fully implement this new Policy on Campus. The Deanship of Graduate Studies and Research will be responsible for the implementation of these Norms and Procedures through the Assistant Dean for Sponsored Programs and Entrepreneurial Initiatives (OSPEI). The Assistant Dean for Research will be responsible for the appropriate training according to the recently approved RCR Training, now under enactment, also in coordination with the Project for Performance Management, at the Office of Strategic Planning and Budgeting.

For further information, questions or recommendations, please contact Carmen Bachier, Assistant Dean for OSPEI at extension 86730, email: [cbachier@degi.uprrp.edu](mailto:cbachier@degi.uprrp.edu) or Lorena Soler, Legal Advisor for Research at email: [lsoler@degi.uprrp.edu](mailto:lsoler@degi.uprrp.edu).

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**NORMS AND PROCEDURES FOR MANAGING FINANCIAL CONFLICT OF INTEREST AND COMMITMENTS IN SPONSORED AND NON-SPONSORED RESEARCH AT THE UNIVERSITY OF PUERTO RICO, RÍO PIEDRAS CAMPUS**

**Introduction**

These norms and procedures are issued to comply with Certification 8, 2012-2013 of the University of Puerto Rico, Board of Trustees on: *"Policy and Guidelines for Financial Conflict of Interest and Commitments in Research and Sponsored Programs of the University of Puerto Rico"*. They are directed **to identify, eliminate or appropriately manage** any conflict of interest (COI), - actual, potential or apparent -, whether financial or of other nature, that affect or could affect researchers and other involved personnel compliance with their professional responsibilities, commitments and contractual obligations to the University of Puerto Rico. The norms and procedures are effective immediately.

**Scope**

These norms and procedures must be followed by all researchers and involved personnel in **sponsored and non-sponsored research** where there is an identified, potential or apparent conflict of interest. They are issued in accordance with Certification 8, 2012-2013, Board of Trustees, and as such, in accordance with Public Health Service (PHS) regulations, specifically: "Responsibility of Applicants for Promoting Objectivity in Research for which PHS Funding is Sought" (42 C.F.R. Part 50, Subpart F) and "Responsible Prospective Contractors" (45 C.F.R. Part 94). For further information, refer to: <http://grants.nih.gov/grants/policy/coi/>.

Requirements for the sole Purpose of PHS related research include: (1) Investigators Financial Conflict of Interest (FCOI) compulsory training prior to engage in PHS-funded research and re-training every four years; (2) Disclosure of significant financial interest (SFI) from \$5,000 or above, or of other nature, to both the granting agency and the Institution; (3) Institution reporting to the granting agency about identified, potential or apparent conflict of interest; (4) information on COI accessible to the public, and (5) enforcement of the policy with sub awardees.

**Definitions**

Following there are essential definitions. Refer to Certification 8, 2012-2013, Board of Trustees for other recognizable definitions.

1. **Financial Conflict of Interest (FCOI)**: an actual FCOI arises when a financial interest (remuneration or other source) is likely to compromise or influence the objective design, conduct, reporting or direct administration of research. An apparent conflict of interest arises

when there is a reasonable apprehension that financial interest could compromise the design, conduct, reporting or direct administration of research.

2. **Conflict of Commitment:** When a researcher or involved personnel engages in an outside activity (management, employment, advisory, consulting, other) that interferes with its primary responsibilities, commitments and contractual obligations (teaching, research, institutional committee memberships and consultations, others) to the University of Puerto Rico and the Río Piedras campus, even if the activity is valuable to the University or contributes to the individual professional development and competence.
3. **Management Plan:** Refers to the actions and measures designed to address the risks of actual, potential or apparent conflict of interest to mitigate or manage the financial conflict of interest or of other nature.
4. **Financial Interest:** Means anything of monetary value, whether or not the value is readily ascertainable such as: compensation for management, advisory or consulting roles; gifts, services, loans; payments or in-kind gifts for services; licensing, patent, royalty and other intellectual property agreements; equity interests in public or private company (stock, stock options, bonds, property interests, dividends, convertible securities or other ownership interests); a position in an external entity giving rise to a fiduciary duty such as director, Officer, partner, trustee, employee or any position of management; or for researchers with funding for PHS, any reimbursed or sponsored travel.
5. **Researcher or involved personnel:** Refers to the Principal Investigator or Director, and any other person, regardless of title or position, who is responsible and has the authority to make independent decisions related to the design, conduct, reporting or direct administration of research, including sub awardees, collaborators and consultants.
6. **Non-sponsored research:** Research that is supported by the University of Puerto Rico and the Río Piedras Campus with institutional funds like seed money, funds to promote research (e.g. FIPI and indirect costs), cost sharing funds, endowment funds, fellowships and licensing incomes.
7. **Significant Equity Interest:** Is defined differently for a public or private business by the federal government. For a public business, the SEI means an aggregated equity interest for the researcher and his/her family that exceeds the current PHS threshold at or above \$5,000 in value as determined in reference to public prices or other reasonable measures of fair market value, or representing 5% ownership in such business. For a privately held business, SEI means any equity interest in such business, regardless of the amount.
8. **Significant Financial Income:** Refers to aggregated payments or anything of monetary value (including the value of an equity interest) from a single entity on behalf of the researcher or his/her family for the past 12 months or expected over the next 12 months, exceeds the PHS threshold.
9. **Significant Financial Interest (SFI):** A financial interest that includes a SEI or SFI. Includes remuneration and anything of monetary value or potential monetary value held by the researcher or his/her family and that reasonably appears to be related to researcher primary responsibilities, as follows:

- a. For any public entity, remuneration received from the entity in the 12 months preceding the disclosure and the value of any equity interest in the date of disclosure, that when aggregated exceeds \$5,000.
- b. For any non-public entity, the value of any remuneration received in the calendar year preceding the disclosure, that when aggregated, exceeds \$5,000, or any equity interest (e.g., stock, stock option, or other ownership interest);
- c. Intellectual property royalties or incomes (e.g., patents, copyrights)
- d. A position giving rise to a fiduciary duty, such as director, Officer, partner, trustee, employee, or any position of management.

For Investigators applying for research funded by the PHS, any reimbursed or sponsored travel related to the investigator's institutional responsibilities (e.g., Travel paid on behalf of the investigator and not reimbursed to the investigator so that the exact monetary value may not be readily available). Disclosure of this interest will include the purpose and duration of the trip, the identity of the sponsor/organizer, and the travel destination.

For the purpose of ***Significant Financial Interest***:

- Remuneration includes payments (e.g., consulting fees, honoraria, paid authorships, others) for services not part of the Institutional Base Salary (IBS as defined by Certification 15, 2011-2012, Board of Trustees).
- Equity interest includes any stocks, stock options or other ownership interests, as determined by public prices or other reasonable measures of fair market value.

***Significant Financial Interest*** does not include:

- Salary or other remuneration paid by the University to the investigator if the investigator is currently employed or otherwise appointed by the University;
- Income from investment vehicles, such as mutual funds and retirement accounts, as long as the investigator does not directly control the investment decisions made in these vehicles;
- Income from seminars, lectures, teaching engagements, or travel reimbursed or sponsored by a federal, state, or local government agency, an institution of higher education, an academic teaching hospital, medical center, or research institute affiliated with an institution of higher education; or,
- Income from service on advisory committees or review panels for a federal, state, or local government agency or institution of higher education.

## Guidelines

1. The Office of the **Dean of Graduate Studies and Research (DGSR)** will be the unit responsible for the implementation and enforcement of this Policy. Specifically, the:
  - a. **Assistant Dean for Research at DGSR** will be responsible for the FCOI training and re-training as part of the Responsible Conduct in Research (RCR) compulsory training approved by the campus Administrative Board, Certification 29, 2012-2013.
  - b. The **Assistant Dean for Sponsored Program and Entrepreneurial Initiatives (OSPEI)** will be responsible for the implementation and follow-up of these norms and procedures.
  - c. The **Legal Advisor for Research at DGSR** will be the campus Conflict of Interest Officer (COI OFFICER).
  - d. The **Chancellor** will appoint an ad-hoc **Conflict of Interest Committee (COI Committee)** on a biannual basis to assist the COI Officer with the:
    - i. evaluation of conflict of interest disclosures filed by researchers or other involved personnel;
    - ii. establishment of criteria for such evaluations including expedite or more comprehensive evaluations;
    - iii. definition of the COI Committee procedures, documents and deadlines;
    - iv. development of the management plans necessary to mitigate or manage the conflict of interests.

Any member of the COIC which has a vested interest on any research for which a disclosure of conflict of interest is being evaluated must refrain from participating in the evaluation or in the development of the management plan.

2. Research involving human subjects will follow campus already established norms and procedures. For this purpose, refer to the **IRB Compliance Officer** under the **Assistant Dean for Research at DGSR**. At any time, and as a general rule, the University of Puerto Rico will not allow a researcher or involved personnel to conduct a clinical research project where there is a conflict of interest; this apply to any role that the researcher or involved personnel might have in the project.
3. University officials with a SFI in a sponsored or non-sponsored research project must not participate in the solicitation, negotiation of contract terms and conditions and oversight of the research, neither should be responsible for managing any financial conflict of interest held by the research team members.

## Procedures

1. Any researcher or involved personnel that recognizes an actual, potential or apparent conflict of interest must file the **Conflict of Interest Disclosure Form (COID Form)** included with these norms and procedures or its electronic format available at: <http://graduados.uprrp.edu/dafe/legal-advisor/index.html>
2. The **COID Form** must be submitted to the **COI Officer** prior to engaging in any research activity whether sponsored or not sponsored. Failure to comply with the COID Form may delay the release of research funds and needed authorizations for the conduct of research for both sponsored and non-sponsored research.
3. The **COID Officer** will evaluate the **COID Form** and determined if the disclosed conflict of interest constitutes a SFI and therefore an actual, potential or apparent conflict of interest exists.
4. If an actual, potential or apparent conflict of interest exists, the **COI Officer** will determine if the **COID Form** requires further review or could be approved on an expedite basis. When a comprehensive evaluation is required, the **COI Committee** will conduct the assessment following customary procedures. The **COI Committee** will approve, in collaboration with the **COI Officer**, criteria and procedures to evaluate the **COID Forms** and for expedite or comprehensive evaluations.
5. Based on the COI committee assessment, when deemed necessary, to eliminate, mitigate or manage a conflict of interest, the **COI Officer** will meet with the researcher or involved personnel to design and agreed on a management plan. The **COI Officer** will present the management plan to the **COI Committee** for final approval. The management plans will follow at the minimum general guidelines as provided in Certification 8, 2012-2013, Board of Trustees.
6. At all times, the **COI Officer** will notify the corresponding Dean and Department Chair, and OSPEI of **COID Forms** under evaluation or approved and of any management plans established to manage conflict of interest. These institutional Officials will make sure that the researchers or involved personnel will not initiate or conduct any research where a conflict of interest has been disclosed prior to the required approvals as described in these norms and procedures.
7. The COI Officer will work with the researcher and involved personnel to make sure full compliance with the policy and these norms and procedures.
8. If after the onset or during the course of a research an actual, potential or apparent conflict of interest is identified that was not anticipate, the researcher or involved personnel must submit the **Conflict of Interest Disclosure Form (COID Form)** to the **COI Officer** in five (5) working days. The **COI Officer** will work with the researcher and involved personnel an interim management plan until the **COID Form** is approved but no later than two months for a comprehensive evaluation and approval of a formal management plan (if necessary) or one month for an expedite revision. Likewise, any new researcher added to the project must file a **COID Form** and changes in the nature or level of the conflict of interest will require an **updated COID Form**.
9. The COID Form must be updated annually by September, 1<sup>st</sup>, for the time period of the grant for sponsored research or the project for non-sponsored research. The **COI Officer** will evaluate the **updated COID Forms** and proceed as described previously.

10. For PHS or any other research conducted throughout a sub recipient, the COI Officer will incorporate as part of the sub award written agreement a statement to establish the policy on conflict of interest that applies, whether that of the sub recipient institution or the University of Puerto Rico. In the first case, the written agreement must include a certification that the policy on conflict of interest of the sub recipient institution complies with PHS regulations for objectivity in research. Also, it must specify the periods for reporting to the University of Puerto Rico, Río Piedras campus identified conflict of interests and information therein.  
If the University of Puerto Rico policy applies, the subrecipient written agreement must specify the time periods for conflict of interest disclosures and makes reference to Certification 8, 2012-2013, Board of Trustees or provides a copy, if necessary, to ensure full compliance.
11. The **Assistant Dean for Research** will work with the **COI Officer** on periodic auditing, to assess compliance with the approved management plans.

### **Formal Training**

All researchers and involved personnel must attend formal training in FCOI according to the campus RCR training requirement as stated in Certification 29, 2012-2013, Administrative Board. For PHS related research, the researchers and involved personnel must take the web-based NIH Tutorial on Financial Conflict of Interest found at: <http://graduados.uprrp.edu/dafe/legal-advisor/index.html>. The training must be completed prior to engaging in any sponsored or non-sponsored research. Evidence of approval must be provided to the COI Officer for the project records.

### **Records**

The COI OFFICER and the researchers or principal investigators must maintain records of FCOI disclosures, management plans or related documentation for at least three years after the closure of the project or the last payment issued, or as required by law. This disposition applies to all research projects federally funded or not.

These records, when and where applicable by state and federal laws, will be accessible to the public on written request in five (5) working days; otherwise the information must be handled protecting the confidentiality of the information reported. See Certification 8, 2012-2013, Board of Trustees for further reference.

OSPEI will provide guidance to researchers and involved personnel with respect to the electronic COI reporting system available through the NIH-eRA Commons (For PHS related research only).

### **Non-Compliance and the Appeal Process**

In the event that a researcher or involved personnel do not comply with these norms and procedures, the Campus will take appropriate measures according to University of Puerto Rico disciplinary policies, where applicable. The researcher or involved personnel must comply by filling the required disclosure forms but also, when necessary, must comply with the management plan agreed on to mitigate and manage the financial or of other nature conflict of interest.

If failure to comply with the conflict of interest policy (Certification 8, 2012-2013, Board of Trustees) and these norms and procedures has biased the design, conduct, reporting and administration of a research project, the University of Puerto Rico will notify the granting or sponsor agency as required by applicable laws and inform about the corrective or disciplinary actions taken.

Any researcher or involved personnel adversely affected by these norms and procedures will follow University of Puerto Rico appeal procedures beginning with the Dean of Graduate Studies and Research, and the campus Chancellor. When the researcher or involved personnel is in disagreement with the response or actions taken, he/she can appeal to the Vice President for Research and Technology, the President of the University and the Board of Trustees, in that order.

### **Assessment**

The **Assistant Dean for Sponsored Programs and Entrepreneurial Initiatives** in collaboration with the **COI Officer** will prepared an annual report to the **Chancellor, the COI Committee, the Assistant Dean for Research and the Dean for Graduate Studies and Research** on new and updated disclosures, management plans, training and re-training of researchers and involved personnel, level of compliance and enforced disciplinary actions in reported non-compliance situations.

March 20, 2013

*Annexes*



**University of Puerto Rico**  
**Disclosure of Investigator's Significant Financial Interest**  
**FORM 1.A**

*42 CFR Part 50 Subpart F – Title 42: Public Health; Part 50: Policies of General Applicability;  
 Subpart F: Promoting Objectivity in Research*

**Date of this Disclosure:** \_\_\_\_\_ **New**  **Update**

Investigator  collaborator  or consultant  at University of Puerto Rico \_\_\_\_\_ Campus.

First Name	Middle Initial	Last Name

**Office phone:** \_\_\_\_\_ **E-mail address:** \_\_\_\_\_

If you answer **Yes** to any of the following questions you may have a significant financial interest in an entity and should file Form B. A *significant financial interest* means a financial interest consisting of one or more of the following interests of the Investigator (and those of the Investigator's spouse and dependent children) that reasonably appears to be related to the Investigator's institutional responsibilities.

ANSWER THE FOLLOWING QUESTIONS	Yes	No
<p><b>(i) With regard to any publicly traded entity, did you receive any remuneration from the entity in the twelve months preceding this disclosure or have any equity interest in the entity as of the date of disclosure, that when aggregated, exceeds \$5,000?</b></p> <p>For purposes of this definition, remuneration includes salary and any payment for services not otherwise identified as salary (e.g., consulting fees, honoraria, paid authorship); equity interest includes any stock, stock option, or other ownership interest, as determined through reference to public prices or other reasonable measures of fair market value.</p>		
<p><b>(ii) With regard to any non-publicly traded entity, did you receive any remuneration from the entity in the twelve months preceding this disclosure, that when aggregated, exceeds \$5,000, or when the Investigator (or the Investigator's spouse or dependent children) holds any equity interest (e.g., stock, stock option, or other ownership interest)?</b></p>		
<p><b>(iii) Do you receive income from intellectual property rights and interests (e.g., patents, copyrights), not assigned to the UPR?</b></p>		
<p><b>(iv) Have you had any reimbursed or sponsored travel (<i>i.e.</i>, that which is paid on behalf of the Investigator and not reimbursed to the Investigator so that the exact monetary value may not be readily available), related to your institutional responsibilities?</b></p> <p>Provided, however, that this disclosure requirement does not apply to travel that is reimbursed or sponsored by a Federal, state, or local government agency, an Institution of higher education as defined at 20 U.S.C. 1001(a), an academic teaching hospital, a medical center, or a research institute that is affiliated with an Institution of higher education. The Institution's FCOI policy specifies the details of this disclosure, and the institutional official(s) will determine if further information is needed.</p>		

**University of Puerto Rico**  
**Disclosure of Investigator's Significant Financial Interest**  
**FORM 1.A**

The evaluation of these forms by the Financial Conflict of Interest (FCOI) institutional officer will determine if you have a financial conflict of interest that may bias the result of your scientific research funded by the United States Public Health Service and to establish any pertinent actions to mitigate or eliminate the effect of such conflict in the results of the research.

A *financial conflict of interest exists* when the institution, through its designated official, reasonably determines that an Investigator's significant financial interest is related to a PHS funded research project and could directly and significantly affect the design, conduct or reporting of the funded research. *Institution* means any domestic or foreign, public or private, entity or organization (excluding a Federal agency) that is applying for or that receives a PHS research funding. *Investigator* means the project director or principal Investigator and any other person, regardless of title or position, who is responsible for the design, conduct, or reporting of research funded by the PHS, or proposed for such funding, which may include, for example, collaborators or consultants. *Entity* means any domestic or foreign, public or private, organization (excluding a Federal agency) from which an Investigator (and spouse and dependent children) receives remuneration or in which any person has an ownership or equity interest.

The term *significant financial interest* does not include the following types of financial interests: salary, royalties, or other remuneration paid by the Institution to the Investigator if the Investigator is currently employed or otherwise appointed by the Institution, including intellectual property rights assigned to the Institution and agreements to share in royalties related to such rights; any ownership interest in the Institution held by the Investigator, if the Institution is a commercial or for-profit organization; income from investment vehicles, such as mutual funds and retirement accounts, as long as the Investigator does not directly control the investment decisions made in these vehicles; income from seminars, lectures, or teaching engagements sponsored by a Federal, state, or local government agency, an Institution of higher education as defined at 20 U.S.C. 1001(a), an academic teaching hospital, a medical center, or a research institute that is affiliated with an Institution of higher education; or income from service on advisory committees or review panels for a Federal, state, or local government agency, an Institution of higher education as defined at 20 U.S.C. 1001(a), an academic teaching hospital, a medical center, or a research institute that is affiliated with an Institution of higher education.

This disclosure is applicable to each Institution that is applying for, or that receives, PHS research funding by means of a grant or cooperative agreement and each Investigator who is planning to participate in, or is participating in, such research. However, this does not apply to SBIR Program Phase I applications.

I agree to abide by the University of Puerto Rico's Policy and Guidelines on Financial Conflict of Interest. I certify that the above information is true to the best of my knowledge and that it has been submitted as required by law, regulation, contract, and by 42 CFR Part 50 Subpart F. I understand and agree that if there is any change in my financial status, I must submit a new disclosure and attachment within 30 days of that change.

Print name: \_\_\_\_\_

Signature: \_\_\_\_\_

Date: \_\_\_\_\_

**University of Puerto Rico**  
**Financial Conflict of Interest Annual Disclosure Form**  
**Form 2.A**

**PLEASE PRINT**

Name:	Disclosure Year: _____ This is the <i>previous</i> calendar (January-December) year.
Rank/Title:	Grant ID #:
Department:	FTE:
Center:	Institute:
Email:	Campus Phone:

**When do I complete this form?**

Complete this form no later than May 1<sup>st</sup> of each year.

**Question:** During the last calendar year (January through December), did you, your spouse, domestic partner and/or dependent children, alone or in combination, have significant financial interest in an entity that:

- *sponsors* your research or your program,
- has *made or pledged a gift* to the University of Puerto Rico that benefits your research or sponsored program,
- has *products, services, or research interests* that could reasonably appear to be affected by your research or sponsored program,
- *sells goods or services* to the University that will be used in your research or sponsored program, or
- has *another involvement* in your research or sponsored program (such as a consulting agreement)?

↓

A significant financial interest involves:

- (a) receiving compensation during the year over \$5,000 or
- (b) having an equity interest over \$5,000 or

(This does not include 'indirect' equity interest or ownership through mutual funds.)

\_\_\_\_\_ **NO** Your disclosure is complete. Please sign and submit this form.

\_\_\_\_\_ **YES** Sign this form **and** complete a FCOI Annual Disclosure Attachment (Form 2.B) for *each* external entity in which there is a significant financial interest and submit all forms together.

I agree to abide by University of Puerto Rico's Financial Conflict of Interest Policy and Guidelines. In submitting this form and disclosure attachments, if required, I certify that the information provided is true to the best of my knowledge. I supply this information for confidential review by University of Puerto Rico, and for such other limited purposes as are required by law, regulation, or contract. I do not authorize release of any of it for any other purpose. I understand and agree that if there is a material change (an acquisition of a significant financial interest) to this information, I must submit a new disclosure and attachment within 30 days of that change.

Signature: \_\_\_\_\_ Date: \_\_\_\_\_

**University of Puerto Rico**  
**Disclosure of Investigator's Significant Financial Interest**  
**FORM 1.B**

***TO BE FILED BY ALL RESEARCHERS WITH SIGNIFICANT CONFLICT OF INTEREST***

*2 CFR Part 50 Subpart F – Title 42: Public Health; Part 50: Policies of General Applicability;  
Subpart F: Promoting Objectivity in Research*

**Date of this Disclosure:** \_\_\_\_\_ **New**  **Update**

If you answered **Yes** to any of the questions on the *Disclosure of Investigator's Financial Interest (FORM A)* you have a significant financial interest in an entity and should file this **FORM B** to be used by the Financial Conflict of Interest (FCOI) institutional officer to determine if such a financial conflict of interest may bias the result of your scientific research funded by the United States Public Health Service and to establish any pertinent actions to mitigate or eliminate the effect of such conflict in the results of the research.

Investigator  collaborator  or consultant  at University of Puerto Rico \_\_\_\_\_ Campus.

First Name	Middle Initial	Last Name

**Office phone:** \_\_\_\_\_ **E-mail address:** \_\_\_\_\_

**Please use a separate Disclosure Form B for each entity where you have a significant financial interest as per the above referred regulation.**

1. External Entity Type: Publicly Traded  or Non-Publicly Traded
2. Name of External Entity:
3. Physical Address:
4. Indicate, name of principal official or contact person, telephone number and e-mail address of the Institutional Officer at the Entity:

Name of principal official or contact person: \_\_\_\_\_

Telephone number: \_\_\_\_\_ Fax number: \_\_\_\_\_

E-mail address: \_\_\_\_\_

5. Explain the nature of your significant financial interest in this entity (equity, consulting fees, travel reimbursement, honoraria, etc.) at present and/or for the last twelve months preceding the date of this disclosure. Please use assigned letter (A, B, C, D, or E) based on the ranges as follows:

- A. \$0-\$4,999;
- B. \$5,000-\$9,999;
- C. \$10,000-\$19,999;
- D. amounts between \$20,000-\$100,000 in increments of \$20,000; or
- E. amounts above \$100,000 in increments of \$50,000.

**University of Puerto Rico  
FCOI Disclosure Attachment  
Form 2.B**

**Who should complete this form?**

If you answered "Yes" to the question on the FCOI Annual Disclosure Form (Form 2.A) you must complete an attachment (Form 2.B) for *each entity* in which you and/or your family member(s) have a significant financial interest. "Family members" is defined as your spouse, domestic partner, and/or dependent children.

**When do I complete this form?**

FCOI Annual Disclosures are due no later than May 1<sup>st</sup> of each year. Please submit both forms at the same time.

**Please use a separate FCOI Disclosure Attachment for *each* external entity.  
Additional sheets may be used if more space is needed for your responses.**

**Name:**

**Disclosure Year:** \_\_\_\_\_

This is the previous calendar (January-December) year.

1. Please describe your role(s) and responsibilities at the UPR:

2. What is the name of the external entity in which you and/or your family member(s) have a significant financial interest?  
(If more than one entity is involved, please complete a separate Attachment form for each entity.)

3. Entity type:  Non-profit     For-profit (publicly-owned)     For-profit (privately-held)     Governmental  
 Unknown     Not applicable

4. What is the primary business of this entity?

5. What position do you and/or your family member(s) hold with this entity (e.g., shareholder, director, officer, employee)?

6. (a) What is the nature of the work that you and/or your family member(s) perform for this entity?

(b) Do you and/or your family member(s) have a written employment agreement with this entity?  No  Yes

7. How is the work you and/or your family member(s) perform for this entity similar to or different than the focus of your University research or sponsored program?

**(Continue to Reverse Side)**

8. Check all of the following relationships that this entity has with the UPR:

- Research Collaborator       Vendor       Unknown  
 Licensee of UPR Innovations       Donor (Gift)  
 Employs UPR Graduate Students       None  
 Other (please describe):

9. (a) Are any UPR resources (e.g. facilities, equipment, employees) used on behalf of the entity?

- No  
 Yes, in the last 12 months  
 Yes, within the next 12 months

(b) If yes, is there a written agreement between the UPR and the entity to manage their use?  No  Yes  
(c) If yes, what resources are shared?

10. (a) Is the financial interest derived from royalties or licensing fees?  No  Yes If yes, please describe the intellectual property to which these interests are related:

(b) Is there or will there be a UPR licensing agreement associated with this interest?  No  Yes

11. With respect to your UPR sponsored research or sponsored program:

- (a) Do you collaborate with any family members?  No  Yes  
(b) Are any family members paid through your award?  No  Yes

If "Yes" to either (a) or (b) please provide their name(s): \_\_\_\_\_

- (c) Have you applied for or do you have current funding from NIH?  No  Yes  
(d) Have you applied for or do you have current funding from NSF?  No  Yes  
(e) Does the research involve human participants?  No  Yes

12. Do you have a UPR Management Plan in place for this financial interest with this entity?  No  Yes

13. Please explain what steps you and/or your family member(s) take (or propose to take) to manage, reduce, or eliminate potential or actual financial conflicts of interest with this entity:

I agree to abide by University of Puerto Rico's Financial Conflict of Interest policy. In submitting this form and disclosure attachments, if required, I certify that the information provided is true to the best of my knowledge. I supply this information for confidential review by University of Puerto Rico, and for such other limited purposes as are required by law, regulation, or contract. I do not authorize release of any of it for any other purpose. I understand and agree that if there is a material change (an acquisition of a significant financial interest) to this information, I must submit a new disclosure and attachment within 30 days of that change.

Signature: \_\_\_\_\_ Date: \_\_\_\_\_