

# UNM CONFLICT OF INTEREST DISCLOSURE

## Cover Sheet

Principal Investigator: \_\_\_\_\_

Department: \_\_\_\_\_

Funding Agency: \_\_\_\_\_

Dates of Project: \_\_\_\_\_ to \_\_\_\_\_ PDS # /SPAS # (if known) \_\_\_\_\_

Project Title: \_\_\_\_\_

Each investigator must complete the COI disclosure form and submit it with each proposal for new or renewal support of sponsored UNM research or nonsponsored UNM research that involves human subjects, animal subjects, or research funded by an award from internal UNM sources based on submission of a proposal (e.g., RAC).

The principal investigator is responsible for identifying each person who will be involved with the project who would be considered by the definition in the policy to be an "investigator" (see definition on reverse). The principal investigator needs to submit this cover sheet with his/her own disclosure, and needs to advise every other investigator listed below of the disclosure requirements. Proposals cannot be approved administratively in the Office of Research Services until a Disclosure Form is obtained from each investigator.

### A. Investigators to be paid through UNM as employees:

- |          |          |
|----------|----------|
| 1. _____ | 5. _____ |
| 2. _____ | 6. _____ |
| 3. _____ | 7. _____ |
| 4. _____ | 8. _____ |

### B. Investigators to be paid through UNM as consultants:

- |          |          |
|----------|----------|
| 1. _____ | 3. _____ |
| 2. _____ | 4. _____ |

**C. Investigators to be paid through Subcontractors** (If the Subcontractor has comparable policies and procedures in place to review and manage potential conflict situations, please attach Subcontractor policy or reference Subcontractor URL):

- |          |          |
|----------|----------|
| 1. _____ | 3. _____ |
| 2. _____ | 4. _____ |

**D. Investigators not paid by UNM or unpaid investigators** (could include UNM faculty, staff or students, or consultants):

- |          |          |
|----------|----------|
| 1. _____ | 3. _____ |
| 2. _____ | 4. _____ |

# UNM CONFLICT OF INTEREST DISCLOSURE FORM

Investigator: \_\_\_\_\_ Department: \_\_\_\_\_

Funding Agency: \_\_\_\_\_ Proposal # (if known) \_\_\_\_\_

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Each investigator must complete this disclosure form and submit it with each proposal for new or renewal support of sponsored UNM research or nonsponsored UNM research that involves human subjects, animal subjects, or research funded by an award from internal UNM sources based on submission of a proposal.

**1. Do you (including your spouse, domestic partner, and dependent children) have any of the financial interest(s) described below that are related to the research being proposed? Interests are "related to the research" if they are:**

- in the sponsor of the research (even if unrelated to the research being proposed),
- in another entity conducting research or business in the same general field as the proposed research (such as a competitor of a drug company or other research sponsor),
- in an entity whose interests could be affected by the research (such as a company with ties to the research or whose business might be affected by the outcome of the research), or
- that themselves could be affected by the research (such as where the research outcome might affect the value of stock or the necessity for continued consulting services):

YES  NO  Aggregated salary, royalties or other payments, such as consulting fees and honoraria, other than through UNM or STC, that are expected to total more than \$10,000 over the next 12 months?

YES  NO  Equity interests in a single entity, such as stocks, stock options and other ownership interests, that are more than \$10,000?

YES  NO  Equity interests in a single entity, such as stocks, stock options and other ownership interests, that represent more than a 5% ownership interest?

YES  NO  Intellectual property rights, such as patents and copyrights, or royalties from these rights, other than through UNM or STC?

**2. Do you have any of the following:**

YES  NO  An agreement with one or more private parties that could appear to give them preferential treatment over a government funding agency or other sponsor of the project (e.g. first delivery of project data).

YES  NO  An agreement to receive financial benefits from the research beyond what is described in the proposal budget submitted to UNM.

YES  NO  Outside employment that could appear to cause a potential conflict with this research, or raise questions about your professional commitments in undertaking the research or your primary allegiance to UNM.

YES  NO  A position as a director, officer, partner, trustee, manager or employee of an outside entity that conducts business in an area related to the research.

**3. Are you aware of any other potential or actual conflict of interest situations in this research?**

YES  NO

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**If I have answered YES to any of the above questions, I have described the situation in detail on a separate sheet and attached it to this form.** I know of no other potential or actual conflict of interest situations in this research. I will report any change within 30 days after it occurs.

\_\_\_\_\_  
Signature of Investigator

\_\_\_\_\_  
Date

## Conflicts of Interest in Research Policy

An excerpt of the University of New Mexico Conflicts of Interest in Research Policy, approved by the UNM Board of Regents on April 11, 2000, is shown below. A copy of the full policy is available from the Office of Research Services.

### Introduction

Conflicts of interest may occur when an investigator's research responsibilities compete with his or her private interests, such as financial interests, raising questions of objectivity and improper gain. Conflicts of interest are inevitable in modern research universities and do not imply any impropriety on the part of the investigator. A conflict of interest may exist despite the highest standards of conduct and candor. Most conflicts can be successfully resolved without impeding research activities.

### Definitions

**Conflict of interest** means a situation associated with an investigator's participation in UNM research where it reasonably appears, on an actual or potential basis, that the investigator's significant financial interest could directly and significantly affect the design, conduct or reporting of UNM research activities; or the investigator's situation could directly and significantly compromise his or her professional commitments or allegiance to UNM.

Examples of the types of situations that may come within this definition include:

- Holding a direct or indirect interest in an outside entity that conducts business in an area closely related to the UNM research or serving as a director, officer, partner, trustee, manager or employee in such an entity.
- Undertaking or steering UNM research to serve the research or other needs of an outside entity, without approval of UNM or the research sponsor.
- Directing potential research efforts away from UNM and toward the investigator's outside entity, or an outside entity in which the investigator has a financial interest.
- Transmitting to an outside entity without the sponsor's consent, or otherwise using for personal gain, sponsored work products, results, materials, records or information that are not generally made available. This does not necessarily preclude contracts between faculty start-ups and either UNM or the Science & Technology Corporation @ UNM, although these contracts may give rise to conflict of interest situations.
- Using privileged information acquired in connection with the investigator's sponsored UNM research activities for personal gain or for unauthorized purposes. Privileged information includes medical, personnel or security records of individuals, anticipated material requirements or price actions, possible new sites for government operations, and knowledge of forthcoming programs or selection of contractors or subcontractors in advance of official announcements.
- Negotiating or influencing the negotiation of contracts related to the investigator's sponsored UNM research between UNM and outside entities with which the investigator has consulting, equity or fiduciary relationships.
- Accepting gratuities or special favors from entities with which UNM does or may conduct business in connection with sponsored UNM research, or extending gratuities or special favors to employees of the sponsor, under circumstances that reasonably might be interpreted as an attempt to influence the recipients in the conduct of their duties.

**Investigator** means the principal investigator, the co-principal investigator and any other person (including faculty, staff and students) who is responsible for the design, conduct or reporting of UNM research. Any individual responsible for a task that could have a significant effect on the research design, conduct or reporting is considered to be an investigator, even if the individual does not have sole or primary responsibility for the task or the research.