Federal regulations require that institutions have policies and procedures in place to ensure that faculty, staff and administrators who participate in externally sponsored projects disclose any significant financial interests that may represent an actual or potential conflict of interest in relationship to externally sponsored projects.

All investigators receiving external funding shall disclose to the Associate Vice President for Research (AVPR) – Research Integrity Alice Young by October 1, 2014, their significant business or financial interests, including interests of their spouse and dependent relatives or household members that reasonably appear to be related to the investigator’s institutional responsibilities. Investigators who have no significant business or financial interests shall submit a disclosure to that effect.

AY 2014-2015 disclosure forms are available strictly via a secure, eRaider-authenticated link at
Disclosure information can be found at [http://www.depts.ttu.edu/vpr/integrity/FCOI.php](http://www.depts.ttu.edu/vpr/integrity/FCOI.php); the OP is posted here [http://www.depts.ttu.edu/opmanual/OP74.17.pdf](http://www.depts.ttu.edu/opmanual/OP74.17.pdf).

Significant changes to the OP include:

- OP 70.37, Disclosure of Significant Business or Financial Interests that may Represent Conflicts of Interest, has been reassigned as OP 74.17.
- The AY 2014-2015 disclosure forms will be available strictly via a secure, eRaider-authenticated link, unless otherwise authorized by the AVPR. All disclosure forms (those reporting no significant business or financial interests and those reporting significant business or financial interests) will be electronically forwarded to the unit head, then to the designated official, and finally to the AVPR.
- The minimum monetary threshold for reporting a significant financial interest (SFI) for non-PHS investigators has been lowered from $10,000 to $5,000.
- Clarification that a SFI does not include mutual funds and other managed accounts, such as retirement accounts; however, investments in retirement accounts in which the investigator has control over which specific stocks or other equity interests are purchased might trigger a need for disclosure if a particular holding directed by the investigator would reasonably appear to be affected by the specific research project.
- The minimum threshold for travel disclosure is increased from any amount to an aggregate amount of $5000 from a single entity in the 12 months prior to disclosure. (Applies to PHS investigators)
- Clarification that the OP applies to TTU employees and other individuals planning to act as investigators.
- If a potential or actual conflict of interest is identified, a signed FCOI management plan must be in place prior to expenditure of awarded funds.
• Clarification of potential sanctions to include suspension of award funds and withholding of salary.
Investigators whose disclosures indicate potential financial conflicts of interest will be contacted by the AVPR in order to develop management plans that address those potential conflicts.

The U.S. Public Health Service (PHS) (which includes NIH) changed the financial disclosure requirements for applicants and grantees, effective 24 August 2012. If you complete the non-PHS disclosures and then decide to apply for PHS/NIH funds during the next year, you will have to complete the PHS form before ORS can submit the proposal. PHS/NIH strictly enforces disclosure on their terms before proposal submission.

Please note: Obtaining approval for outside employment is a separate process managed by the Office of the Provost and involves your chair, your dean and Senior Vice Provost Rob Stewart. For your convenience, the outside employment form (OP 32.07; OP 74.17 Attachment A) is also available on the previously cited website.

Please contact Amy Baugh, Financial Disclosure Administrator, (amy.baugh@ttu.edu), or Dr. Alice Young (alice.young@ttu.edu) with questions, comments, or concerns. Thank you for your cooperation.