

SIGNIFICANT FINANCIAL INTEREST AND FOREIGN TALENT RECRUITMENT PROGRAM DISCLOSURE FORM

Northern Arizona University is committed to promoting objectivity, openness, and transparency in research and ensuring institutional compliance with applicable federal regulations and non-federal agency guidelines. Accordingly, the Office of Sponsored Projects (OSP) requires all Investigators¹ to submit annually and prior to the submission of sponsored projects proposals the following: 1) a significant financial interest (SFI) disclosure,² 2) a Foreign Talent Recruitment Program (FTRP) disclosure, and 3) certification that they are not party to a Malign Foreign Talent Recruitment Program.³ Completion and submission of this form fulfills these disclosure and certification requirements. NAU's goal is to support Investigators in protecting the integrity of their research and ensuring the design, conduct, and reporting of sponsored projects activities will not be biased by an Investigator's SFIs or subject to undue influence by foreign entities.

Federal and other applicable agency proposals/applications **will not be submitted until all required disclosure certifications have been completed** by all Investigators and submitted to OSP. Compliance with this requirement is a prerequisite for acceptance by Northern Arizona University of a federal or other applicable agency sponsored grant or contract award.

DISCLOSURE INSTRUCTIONS

- All Investigators must, at a minimum, complete and certify Section I of the disclosure form below.
Sections II and III must also be completed when the following criteria are met:
 - If any answer to the questions in Section I.A regarding significant financial interests is "yes", then complete and certify Section II.
 - If the answer to the question in Section I.B regarding participation in Foreign Talent Recruitment Programs is "yes," then complete and certify Section III.
- Submit the completed disclosure certification to the assigned Pre-Award Research Administrator in OSP.
- If there is a material change in an Investigator's previously disclosed significant financial interests or FTRP participation, a revised disclosure certification must be completed and filed with OSP **within thirty (30) days** of the change.

All disclosures will be reviewed and handled according to NAU's Conflicts of Interest in Sponsored Projects Policy and Participation in Foreign Talent Recruitment Programs Policy.

All NAU Investigators seeking external sponsored funding from a Federal agency and other applicable agencies are required to complete this form before a proposal can be submitted.

Questions concerning sponsored projects or research-related disclosures should be addressed to: Thomas Champagne, Associate Vice President for Research Thomas.Champagne@nau.edu

¹ "Investigator" means any individual who is responsible for the design, conduct, or reporting of a sponsored project, or a proposal for such funding. This definition is not limited to those titled or budgeted as Principal Investigator (PI), co-investigator, or key personnel, and may include postdoctoral fellows, senior scientists, or graduate students. This definition may also include collaborators or consultants when applicable.

² See COI in Sponsored Projects Policy: <https://nau.edu/university-policy-library/conflict-of-interest-sponsored-projects/>

³ See Participation in Foreign Talent Recruitment Programs Policy: <https://nau.edu/university-policy-library/participation-in-foreign-talent-recruitment-programs/>

Section I: Certifications

Place a check in the appropriate column for each question. Every question is required to be answered and the investigator must certify the information by signing Section 1c below.

Investigator Name: _____

Department/School: _____ Sponsor: _____

Project/Program Title: _____

SECTION 1a: Significant Financial Interests

Yes No

Do you or your family member⁴ hold a position of management, such as board member, director, officer, partner, trustee, employee or consultant with a sponsor, a vendor or (sub) contractor related to the proposed sponsored project activity?

Yes No

Do you or your family member have a Significant Financial Interest (SFI) in a Sponsor, company, vendor or (sub) contractor related to your proposed sponsored project activity?

Significant Financial Interest includes payments (including salary, consulting fees, honoraria and gifts) stock, stock options, and/or any other ownership interest valued at more than \$5,000 or 5% ownership and/or a Financial Interest that:

- if with a publicly traded entity, the aggregate value of any salary or other payments for services received during the 12-month period preceding the disclosure, and the value of any equity interest during the 12-month period preceding or as of the date of disclosure, exceeds \$5,000; or
- if with a non-publicly traded entity, the aggregate value of any salary or other payments for services received during the 12-month period preceding the disclosure exceeds \$5,000; or
- if with a non-publicly traded company, is an equity interest of any value, including venture or other capital financing, during the 12-month period preceding or as of the date of disclosure; or
- is income exceeding \$5,000 related to intellectual property rights and interests not reimbursed through the Institution, or
- reimbursed travel related to your institutional responsibilities (teaching, research, academic advising, etc.) excluding travel reimbursed by U.S. Federal, state or local governmental agencies, U.S. institutions of higher education, research institutes affiliated with institutions of higher education, academic teaching hospitals, and medical centers

Yes No

Could the value of your or your family's Significant Financial Interest reasonably affect the outcome of the proposed sponsored research/activity?

⁴ Family Member includes Investigator's immediate family; specifically dependent children, spouse, or domestic partner.

SECTION 1b: Foreign Talent Recruitment Programs

Yes No

Are you currently participating in, or party to, a Foreign Talent Recruitment Program?

A Foreign Talent Recruitment Program (FTRP) is any program, position, or activity that involves compensation of any kind, including but not limited to:

- Cash,
- In-kind compensation, including research funding, promised future compensation, complimentary foreign travel, things of non de minimis value, honorific titles, career advancement opportunities, or other types of remuneration or consideration
- That is directly provided by a foreign country at any level (national, provincial, or local) or their designee, or an entity based in, funded by, or affiliated with a foreign country, whether or not directly sponsored by the foreign country, to an individual, whether directly or indirectly stated in the arrangement, contract, or other documentation at issue.

** Some common international collaboration activities do not qualify as an FTRP⁵ and therefore do not need to be disclosed here.*

** Participation in a FTRP may be acceptable as long as the arrangement is approved by the individual's supervisor, Chair and/or Dean and the FTRP does not meet the definition of a Malign FTRP.⁶*

If you answered “**YES**” to **any** question in Section 1.a above regarding SFIs, please complete **Section II** below for **every** organization with which you have a Significant Financial Interest.

If you answered “**YES**” to the question in Section 1.b above regarding FTRPs, please complete **Section III** below for each FTRP you are a party to.

Section 1c: Investigator Certification

I have read and understand Northern Arizona University's Conflict of Interest in Sponsored Projects policy and Participation in Foreign Talent Recruitment Programs policy.

I have read, understand, and completed all required sections of this Significant Financial Interest and Foreign Talent Recruitment Program Disclosure form and agree to file a new or updated form a) annually and within 30 days if answers to any question above have changed, b) when I have a new Significant Financial Interest related to the project title referenced above, and/or c) if I initiate participation in a previously undisclosed FTRP.

I certify that the answers to the declaration above are accurate and truthful to the best of my knowledge. I also certify that, at the time of submission of this form, I am not participating in, or party to, a Malign Foreign Talent Recruitment Program.⁷

Investigator Name: _____ **Date:** _____

Investigator Signature: _____

⁵ See Participation in Foreign Talent Recruitment Programs Policy FAQs <https://nau.edu/university-policy-library/participation-in-foreign-talent-recruitment-programs>

⁶ For a definition of “Malign FTRP” see the Participation in Foreign Talent Recruitment Programs Policy. <https://nau.edu/university-policy-library/participation-in-foreign-talent-recruitment-programs>

⁷ Ibid.

Section II: Disclosure of Significant Financial Interests

Complete this form only if you answered "YES" to any questions in Section I.A

Complete and submit one Section II form for each SFI you have to disclose

Investigator Name: _____

1. Name of organization in which you have (or your family has) a Significant Financial Interest:

2. Type of Significant Financial Interest with the organization/individual (check all that apply):

Consultant

Equity Interest

Recipient of Royalties

Employee

Recipient of Honoraria

Other

If other, describe: _____

3. The Significant Financial Interest is between the organization and (check all that apply):

Self

Family Member

4. Have you received in the last twelve (12) months, or do you expect to receive in the next twelve (12) months, payments for salary, director's fees, consulting, honoraria, royalties, or any other payments that when aggregated with payments from this organization to your spouse, domestic partner, and/or dependent child(ren) will exceed \$5,000?

Yes No

5. Have you or your family member had in the last twelve (12) months or do you anticipate having in the next twelve (12) months, stock, stock options, other equity interests, or venture or other capital financing in the organization which, when aggregated have a fair market value exceeding \$5,000 or have or will have an ownership interest of 5% or more in the organization?

Yes No

6. What relationship, if any, is there between the business or activities of the organization and your current or planned areas of research or proposed sponsored activity?

I certify that the answers to the declaration are accurate and truthful to the best of my knowledge.

Investigator Signature: _____ Date: _____

Please forward the completed form to your assigned Pre-Award Research Administrator (PRA). Do not upload this form in Cayuse.

Section III: Disclosure of Participation in Foreign Talent Recruitment Programs

Complete this form only if you answered "YES" to any questions in Section I.B

Complete and submit one Section III form for each FTRP you have to disclose

NAU encourages international collaborations that are mutually beneficial and characterized by academic freedom, open and reciprocal exchange of information, transparency, and integrity. To comply with federal law and regulations, NAU requires⁸ all Senior/Key Personnel ("Covered Individuals") to disclose any participation in a FTRP⁹ and certify that they are not party to a Malign FTRP prior to proposal submission and annually thereafter for the duration of the award.

1. Investigator Name: _____

2. Name of Foreign Talent Recruitment Program (FTRP): _____

3. Name of Foreign Country Associated with the FTRP: _____

4. FTRP Contract/Participation Start Date: _____ Anticipated End Date: _____

5. Type of compensation received in exchange for participation in the FTRP (check all that apply)
 Cash/Salary In-Kind Compensation of any kind (including but not limited to: lab space, equipment, foreign travel, honorary degrees, research funding, promised future compensation or employment)

6. If you are receiving in-kind compensation for your participation in the FTRP, please describe the nature of the compensation:

7. Please describe the time commitment required for you to participate in the FTRP:

⁸ See Participation in Foreign Talent Recruitment Programs Policy: <https://nau.edu/university-policy-library/participation-in-foreign-talent-recruitment-programs/>

⁹ For a list of international collaboration activities that do not qualify as an FTRP, and therefore do not need to be disclosed, see the Participation in Foreign Talent Recruitment Programs FAQ page. <https://nau.edu/wp-content/uploads/sites/26/FAQs-Participation-in-Foreign-Talent-Recruitment-Programs.pdf>

8. Are you required to engage in any particular activities or provide research results and/or Intellectual Property as a condition of your participation in the FTRP?

Yes No

If yes, please describe: _____

9. Do you have written approval from your supervisor, Chair, and/or Dean to participate in the FTRP?

Yes No

.....
I certify that the answers to the questions above are accurate and truthful to the best of my knowledge.

Investigator Signature: _____ **Date:** _____

Please forward the completed form to your assigned Pre-Award Research Administrator (PRA). Do not upload this form in Cayuse.