

# University at Buffalo

## Annual Disclosure of Significant Financial Interests and Significant Obligations (Replaces the former SUNY 2-UB)

As part of its commitment to promoting objectivity in research and in compliance with federal regulations, UB has adopted an [Investigator<sup>1</sup> Disclosure Policy<sup>2</sup>](#) (IDP) to enable faculty entrepreneurship and external partnerships to proceed with the reasonable expectation that the design, conduct or reporting of research by UB faculty, students or staff will not be biased by a conflicting significant financial interest or significant obligation of any Investigator. The IDP requires each Investigator to submit this Annual Disclosure to his/her Dean, preferably on or before November 15<sup>th</sup>, but no later than:

- submission of an application to an external sponsor,
- submission of a proposal to University programs which have a formal proposal process,
- acceptance of any award made without submission of an application, or
- submission of a human or animal study protocol for review by an Institutional Review Board (IRB), the Institutional Animal Care and Use Committee (IACUC), or the Institutional Biosafety Committee.
- The IDP also requires that the Annual Disclosure be updated whenever significant financial interests change.

The completed Annual Disclosure, as well as any subsequent updates should, be placed in a sealed envelope, marked **CONFIDENTIAL**, and mailed or delivered to your Dean. Your Dean cannot approve an application for submission to a sponsor unless s/he has received your Annual Disclosure. Sponsored Programs Administration cannot release awarded grant or contract funds until your Dean has determined whether the award would create a conflict or the appearance of a conflict.

Submission of the Annual Disclosure and updates needed for it to be current and complete satisfies UB's requirements for Investigator disclosure as the requirements of the Department of Health and Human Services, the National Science Foundation (NSF), and the Food & Drug Administration. These agencies require that, by the time an application is submitted, each Investigator has disclosed his/her known Significant Financial Interests (and those of his/her spouse and dependent children) (42CFR Part 50 Subpart F and 45 CFR Part 94 and Section 510 of the NSF Grant Policy Manual.

Submission of the Annual Disclosure will also serve to document compliance with the University's policy on disclosure of all funds generated through use of University faculty or staff time and/or the use of University facilities.<sup>3</sup>

Questions concerning the Investigator Disclosure Policy or the Annual Disclosure should be addressed to Dr. Kenneth M. Tramposch, Associate Vice President for Research. Dr. Tramposch's email address is [kmt1@buffalo.edu](mailto:kmt1@buffalo.edu).

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<sup>1</sup> Underlined terms are defined in the Investigator Disclosure Policy

<sup>2</sup> The Investigator Disclosure Policy is found at: <http://www.research.buffalo.edu/policies/discl.cfm>

<sup>3</sup> <http://policy.business.buffalo.edu/Pages/financial.aspx>

University at Buffalo

Annual Disclosure of  
Significant Financial Interests and Significant Obligations  
Recommended Submission Date: November 15, 2009

Part I

1. a. Do you, your spouse, or your dependent child(ren) currently work as an employee, independent contractor or consultant (paid or un-paid) for any organization(s) other than UB? (Do **not** include seminars, lectures, or service on advisory panels or review groups for governmental agencies.)  Y  N

b. Have you, your spouse and your dependent child(ren) held any such position in the last 12 months?  
 Y  N

2. Do you, your spouse or your dependent child(ren) hold a management position (including service as a director, trustee, partner, or officer) with any organization(s) other than UB?  Y  N

3. a. **Do** you anticipate that you, your spouse, or your dependent children will, in the next 12 months, receive from any single organization(s) other than UB salary, royalties, consulting fees, honoraria or other payments which when added together will total \$10,000 or more?  Y  N

b. Have you, your spouse, or your dependent children received any such payments in the last 12 months?  
 Y  N

4. Do you, your spouse, or your dependent children have stock, stock options, and/or other ownership interests in any single entity which when added together, a.) have a current fair market value of at least \$10,000 or b.) represent more than 5% ownership? (Do not include your CREF account or any other equity that you own only through a mutual fund)  Y  N

5. Have you entered into an agreement with a study sponsor whereby the amount of your compensation or you or your immediate family's ownership interest in the sponsor company will be affected by the outcome of the research?  
 Y  N

6. Is all support for your externally funded research, testing, training, and/or public service projects deposited with and administered by Research Foundation or UB Foundation Services, Inc. as required by the policy on Disclosure of all funds generated through use of University faculty or staff time and/or the use of University facilities?  
 Y  N

If you answered **No** to **Questions 1-5** above, your disclosure is complete. Please sign and date the certification below and forward to your dean. If you answered **Yes to Questions 1, 2, 3, or 4** above, please complete a separate Part II for **every** outside organization with which you have the relationship(s) indicated above. If you answered **Yes** to Question 5 above, please attach a memo to your Dean explaining the relationship between research outcome and compensation. If you answered **No** to **Question 6** above, please complete Part III.

Investigator Certification:

- The information provided in this Disclosure, including any attached Part II forms, is true and complete to the best of my knowledge.
- I will update this Disclosure as needed so that it remains current and complete.

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

Phone: \_\_\_\_\_ Email Address: \_\_\_\_\_

Investigator Name: \_\_\_\_\_ Dept. \_\_\_\_\_

(Type or Print)

2009-2010

Annual Disclosure of  
Significant Financial Interests and Significant Obligations

Part II

Complete Part II only if you answered "YES" to at least one of the questions in Part I.

Attach one Part II form for each organization with which you have the relationships indicated  
in Part I.

Investigator Name: \_\_\_\_\_

Number of Part II forms submitted: \_\_\_\_\_ of which this is number: \_\_\_\_\_

1. Name of organization: \_\_\_\_\_

2. Financial relationship(s) with the organization (check all that apply):

- |   |   |
|---|---|
| <input type="checkbox"/> Consultant             | <input type="checkbox"/> Employee               |
| <input type="checkbox"/> Equity Interest        | <input type="checkbox"/> Recipient of Honoraria |
| <input type="checkbox"/> Recipient of Royalties | <input type="checkbox"/> Other: _____           |

3. The financial relationship is between the organization and (check all that apply):

- Self  
 Spouse  
 Dependent Child(ren)

4. Have you received in the last 12 months, or do you expect to receive in the next twelve 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 and/or dependent child(ren) will exceed \$10,000?  Y  N

5. Have you had in the last 12 months or do you anticipate having in the next 12 months, stock, stock options, or other equity interests in the organization which, when aggregated with those of your spouse and dependent child(ren) in this organization, have a fair market value exceeding \$10,000 or represent an ownership interest of 5% or more?  Y  N

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

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Part III

To be completed only for those projects NOT Administered by RF/UBF

For each externally funded research, testing, evaluation, training or public service project conducted under your direction, please provide the following information:

Sponsor or Funding Source:

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Project Title:

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Project Start and End Date:

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Funding Amount:

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