

Procedures for Disclosure of Research Related Financial Interests

1. Disclosures for proposals to external sponsors

Purdue Investigators

Purdue Principal Investigators (PIs) and Co-PIs use the Proposal Information Portal ([PIP](#)) to provide necessary information related to upcoming proposals. The information shared through PIP is necessary for ensuring adherence with regulatory and compliance matters, including compliance with the university policy on Individual FCOI (Policy II.B.2). In the PIP system, PIs and Co-PIs are required to identify all Investigators (i.e., persons responsible for the design, conduct, and/or reporting of research) for their project, both internal (i.e., Purdue employees and students/trainees) and external Investigators.

Proposal, sponsor, and Investigator information is then uploaded into Purdue's [Financial Interest Disclosure and Management system](#), a dedicated online application. Individual "Action required:" email messages are generated and sent to all identified Investigators on behalf of SPS/Director of Pre-Award using the. Each Investigator is required to complete an online financial interest statement (FIS) for the project and disclose any [Significant Financial Interests](#) (SFIs) held by the Investigator and/or their Dependents (i.e., their spouse and un-emancipated children). If the proposal is submitted to NIH or another PHS agency, or an agency that has adopted PHS-like FCOI regulations, the disclosure of Significant Financial Interests must also include reimbursed or sponsored travel associated with University Responsibilities provided by certain third-parties (follow link to review the definition of [Third Party Sponsored/Reimbursed Travel](#)). For proposals to PHS and PHS-like agencies, SFIs and/or Sponsored/Reimbursed Travel disclosures must be submitted prior to submission of the proposal to the sponsor.

For proposals to [PHS and PHS-like agencies](#), Investigators are also reminded of the requirement to complete FCOI Training, a [Tutorial on Financial Conflict of Interest](#), before they participate in an NIH/PHS-funded project (if the required training has not been completed by Investigator or their training is Out-of-Date).

External Investigators

External Investigators (i.e., Investigators who are not Purdue employees, but are associated with Purdue proposals to external sponsors) must also complete online financial interest statements. External Investigators with project-related SFIs complete interactive web-based forms for [Disclosure of Significant Financial Interests](#) (and for proposals to NIH/PHS agency sponsors, [Disclosure of Reimbursed or Sponsored Travel](#)). Once completed, these forms must be submitted to fcoi@purdue.edu as email attachments.

Disclosed SFIs and sponsored/reimbursed travels are reviewed by Purdue's Responsible Official for Research-Related Conflicts of Interest (RO) to identify financial conflicts of interest (FCOIs). The University will not accept grants or contracts that give rise to FCOIs unless the

conflicts can be appropriately managed through administrative oversight. If a disclosed SFI creates a manageable FCOI, the RO will work with the Investigator to develop and execute an appropriate FCOI Management Plan (MP).

Purdue will comply with all reporting responsibilities imposed by Indiana or federal laws or regulations with respect to SFIs that have been disclosed. The University will comply with all federal and state statutes and regulations requiring public access to disclosed individual SFIs and FCOIs; however, the University will maintain the specific fiscal details of disclosed SFIs and FCOIs as confidential information to the extent allowed by applicable laws or regulations.

2. Investigators submitting protocols for research involving human subjects or living vertebrate animals

When PIs submit protocols to the Human Research Protection Program (HRPP) for research involving human subjects or to the Purdue Animal Care and Use Committee (PACUC) for research, teaching or testing involving living vertebrate animals, they are required to disclose Significant Financial Interests by responding to the relevant questions on the applicable protocol forms.

3. Voting members of University Regulatory Committees

Voting members of Purdue's Institutional Review Boards (IRBs), Purdue Animal Care and Use Committee (PACUC), and Institutional Biosafety Committee (IBC), should disclose to the respective Board or Committee chairperson any Significant Financial Interest (or personal or professional relationship) that may reasonably appear to be related to a protocol which is to be reviewed by the Board or Committee, and to recuse themselves from the review of that protocol.

4. Investigators associated with third parties commercializing Purdue intellectual property

The Purdue Research Foundation Office of Technology Commercialization (OTC) will inform the Responsible Official when a Purdue employee holds an equity interest in, serves as an officer for, or otherwise is involved in a management role with a third party to which OTC is considering licensing University intellectual property. Upon such notification, the Responsible Official will determine whether the employee's role in the third party creates a conflict of interest with respect to Purdue research activities and/or Institutional Responsibilities. If a manageable conflict of interest is identified, a Management Plan will be developed and implemented. Such Management Plans will require that when the employee is an Investigator, their Significant Financial Interest in the third party entity will be disclosed when proposals are submitted to external sponsors and when they seek approval for protocols involving human subjects and living vertebrate animals.