

**VANDERBILT UNIVERSITY  
CONFLICT OF INTEREST CERTIFICATION  
REGARDING PHS- and NSF-SPONSORED RESEARCH**

Since October 1, 1995, the Public Health Service (PHS) and the National Science Foundation (NSF) have required institutions applying for research funding from these agencies to assume responsibility for assuring that the financial interests of the investigators do not compromise the objectivity of the design, conduct or reporting of such research.

For PHS and NSF grant applications or contract proposals, whether new or continuing research, information on **"Significant Financial Interests"** that would reasonably appear to be affected by the research must be provided by any Investigator responsible for the design, conduct or reporting of PHS-funded or NSF-funded research before an application is submitted. Prior to award, the institution must manage, reduce, or eliminate any conflicts of financial interests, i.e., those that could directly and significantly affect the design, conduct or reporting of the research.

**"Investigator"** means the principal investigator and any other person at the institution who is responsible for the design, conduct, or reporting of a research project funded by the PHS or NSF, or proposed for such funding. With respect to financial interests, "Investigator" includes the Investigator's spouse and dependent children.

The PHS and NSF define **"Significant Financial Interest"** of an Investigator as anything of monetary value, including but not limited to salary or other payments for services (e.g., consulting fees or honoraria); equity interests (e.g., stocks, stock options or other ownership interests); and intellectual property rights (e.g., patents, copyrights and royalties from such rights), **where such payments exceed \$10,000 annually, the equity interest exceeds five percent ownership or a value of \$10,000 (whichever is greater) at fair market value, or royalty payments exceed \$10,000 annually.** Exemptions include: (1) salary, royalties, or other remuneration from the grantee institution; (2) income from seminars, lectures, or teaching engagements sponsored by public or nonprofit entities; (3) income from service on advisory committees or review panels for public or nonprofit entities; or (4) equity interest in business enterprises if the value of such interests do not exceed \$10,000 or do not represent more than a five percent ownership interest for any one enterprise when aggregated for the Investigator and the Investigator's spouse and dependent children. Financial interests that would not reasonably be affected by the proposed project are exempt from disclosure.

Assurances are made by completing and submitting the certification below to the sponsored research office with the Vanderbilt Proposal Transmittal Form at the time a grant or contract application is submitted for institutional signature. Any change in Significant Financial Interest prior to or during the award period must be disclosed at the time of the change.

***Certification (to be signed by any individual satisfying the above definition of Investigator; "per" signature not acceptable):  
Please select the number corresponding to one of the two options below and insert that number in the box provided next to your signature line.***

- 1** *I hereby certify that I have no Significant Financial Interest, as defined above, that would reasonably appear to be affected by the research associated with the attached grant proposal.*
- 2** *I have a Significant Financial Interest, as defined above, that would reasonably appear to be affected by the research associated with the attached grant proposal, and I have attached a sealed envelope containing the confidential disclosure required by this certification.\**

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

**Principal Investigator:** Typed or Printed Name/Signature/DATE  \_\_\_\_\_ **Other Investigator:** Typed or Printed Name/Signature/DATE  \_\_\_\_\_

**Other Investigator:** Typed or Printed Name/Signature/ DATE  \_\_\_\_\_ **Other Investigator:** Typed or Printed Name/Signature/DATE  \_\_\_\_\_

**Other Investigator:** Typed or Printed Name/Signature/ DATE  \_\_\_\_\_ **Other Investigator:** Typed or Printed Name/Signature/DATE  \_\_\_\_\_

**If your application includes more than six (6) investigators, please use additional sheets.**

\*If a Significant Financial Interest exists, attach a confidential disclosure in a sealed envelope describing the nature of the financial interest and explaining how it could reasonably be affected by the research described in the proposal. The disclosure will be referred to the appropriate Vanderbilt official for review and, if necessary, a Conflict of Interest Committee for resolution before an award is made.