

Significant Financial Interest Disclosure (SFID)

Who Needs to Fill Out an SFID

Anyone who is an Investigator on a PHS-Funded Research application must complete an SFID prior to submission of the proposal. Anyone who is an Investigator on PHS-Funded Research must complete an SFID prior to award set-up, and every year thereafter that they are on PHS-Funded Research.

When Does an SFID Need to Be Completed

Anyone who is an Investigator on a PHS-Funded Research application must complete an SFID prior to submission of the proposal. Anyone who is an Investigator on PHS-Funded Research must complete an SFID prior to award set-up, and every year thereafter that they are on PHS-Funded Research.

How to Complete an SFID

Investigators who are submitting an application for or have received an award for PHS-Funded Research and do not have a completed SFID within the last 12 months should complete one in the [SFID portal](#). If any assistance with the portal is needed, Investigators should contact the [RCOI Committee Administrator](#).

What Needs to Be Reported on an SFID

According to federal regulations and UWM policy, the following interests of an Investigator, or an Investigator's spouse or dependent children, constitute an SFI:

PUBLICLY TRADED ENTITIES

<i>REPORTABLE</i>	<i>NON-REPORTABLE</i>
The value of remuneration received from an entity in the twelve months preceding disclosure, in combination with the value of any equity interest in the company as of the date of disclosure, exceeds \$5,000	Remuneration received in the twelve months preceding disclosure, in combination with the value of any equity interest in the company as of the date of disclosure does not exceed \$5000

NON-PUBLICLY TRADED ENTITIES

<i>REPORTABLE</i>	<i>NON-REPORTABLE</i>
The value of any remuneration received from an entity in the twelve months preceding disclosure exceeds \$5,000	Remuneration received in the twelve months preceding disclosure does not exceed \$5000

EQUITY INTEREST IN A COMPANY

<i>REPORTABLE</i>	<i>NON-REPORTABLE</i>
Income from intellectual property rights received during the previous twelve months that exceeds \$5,000	Royalty income from intellectual property that arose from University employment and that was assigned to UWM Research Foundation
Service in positions with fiduciary responsibility, including executive positions, senior management positions, or memberships on boards of directors	Service in positions with no fiduciary responsibility or remuneration

TRAVEL

REPORTABLE	NON-REPORTABLE
All reimbursed and sponsored travel over the last twelve-month period	Non-reimbursed travel (i.e. personal travel)
New travel within 30 days of the start of the travel event reimbursed made by an outside entity to cover expenses paid by a PHS funded Investigator as part of a travel event	Travel reimbursed by a federal, state, or local U.S. government agency, a U.S. institution of higher education, a U.S. academic teaching hospital, a U. S. medical center, a research institute affiliated with a U.S. institution of higher education, or travel covered through UWM's e-Reimbursement system

SFID Approval

Investigators who do not have an SFI to report will have their SFID forwarded to the RCOI Committee for review. Investigators who do have an SFI to report will have the SFID routed to their Chair, Dean, and the Vice Provost of Research to approve and to give insight into whether or not it might be a conflict of interest. Once signed by all of the approvers, the SFID is forwarded to the RCOI Committee administrator for review.

Approver Training

Chairs and Deans who approve SFID Forms are required to complete the FCOI Approvers course in CITI. The FCOI approver course is a four-module course addressing Financial Conflicts of Interest, Conflicts of Commitment and Conscience, and Institutional Responsibilities as they Affect Investigators, and Institutional Conflicts of Interest.

RCOI Committee Review of SFID

The RCOI Committee administrator will review all SFID forms as they are completed, determining if there is a nexus between an Investigator's research and the reported interest and if so, if it is or appears to be a conflict of interest.

If there is or appears to be a conflict, the RCOI Committee administrator works with the Researcher to implement a management plan that specifies actions that have been, or will be, taken to manage the financial conflict of interest and report the management plan to the PHS agency affected.

SFI and Non-Compliance Reporting to PHS

UWM is required to monitor Investigator compliance with management plans and provide reports on FCOIs and instances of bias to PHS. If the RCOI Committee finds noncompliance because an Investigator has failed to disclose a reportable outside financial interest or failed to comply with a management plan, the RCOI Committee may impose the following sanctions:

- Require the Investigator to complete additional training
- Withhold research funding
- Conduct a retrospective review
- Report the noncompliance to the PHS awarding component and Dean or other supervisor

If an Investigator with PHS-Funded Research does not report a Significant Financial Interest in a timely manner, UWM needs to review the SFI to determine if there is a conflict of interest, and if a conflict of interest is found, complete a retrospective review.