



Non-Inova Investigator Financial Conflict of Interest (FCOI) Assurance Form

Inova Grants Management Office (GMO)

To be used only for Non-Inova Investigators: a) who are not covered under an institutional subcontract OR b) who are covered under an institutional subcontract and the institution agrees to abide by Inova's FCOI policy.

Please refer to Inova's Financial Conflict of Interest policy at: <https://www.inova.org/about-inova/grants-management/>.

Institution's Legal/Employer Name:

Name of Investigator completing this form:

Address:

City, State, Zip:

Phone:

Email Address:

Title of Grant:

Inova's Principal Investigator:

Sponsor:

Conflict of Interest (only applicable to PHS or other sponsors that have adopted the federal financial disclosure requirements)

- a) I hereby certify that my institution has an active and enforced conflict of interest policy that is consistent with provisions of **42 CFR Part 50, Subpart F "Responsibility of Applicants for Promoting Objectivity in Research."** I also certify that, to the best of my knowledge, all financial disclosures have been made related to the activities that may be funded by or will have been satisfactorily managed, reduced or eliminated in accordance with my institution's conflict of interest policy prior to the expenditure of any funds under any resultant agreement.
- I hereby certify that my institution is registered with a PHS-compliant FCOI policy with the FDP Clearinghouse: http://sites.nationalacademies.org/PGA/fdp/PGA_070596.
- b) I do not have an active and/or enforced conflict of interest policy and hereby agree to abide by Inova's policy and related procedures. You will receive an email with instructions on how to comply with Inova's FCOI requirements.

Required if you selected option b:

I attest that I **have** or **have not** taken the FCOI training as defined in Inova's FCOI Policy. FCOI training is provided through Collaborative Institutional Training Initiative (CITI) for Inova affiliates at <https://www.citiprogram.org>.

Do you, including your spouse and dependent children, have any Significant Financial Interests (SFIs) related to your responsibilities or research conducted at Inova?

- Yes**, I have Significant Financial Interests to report (please provide information regarding your SFIs including reimbursed and sponsored travel).
- No**, I have no Significant Financial Interests, including travel, to report.

By submitting this form you are confirming that you have read and will abide by Inova's Conflict of Interest Policy. You understand your obligation to disclose any change(s) within 30 days of acquiring a new significant financial interest or other conflict of interest that may arise after submission of this form.

Printed Name:

Title:

Signature:

Date:

The information provided will be treated as Confidential. Please contact the Grants Management Office at gmo@inova.org or (703) 776-6810 with any questions or concerns. Please submit your form to gmo@inova.org.

Note: Please note that upon award, Inova may require information in addition to that listed above.

Definition

A “Significant Financial Interest” (SFI) is defined as the receipt by you, your spouse, or your dependent children of any of the following:

- **Income that exceeds \$5,000** from any outside entity, measured on a rolling 12-month basis. This may be one payment from a particular company of more than \$5,000, or multiple payments from the same company that in aggregate exceed \$5,000 and are received within the previous 12 months.
- Acquisition of **equity in a public company that exceeds \$5,000** in value;
- **Aggregated income and equity/ownership interest** from a public company **that exceeds \$5,000**, as measured on a rolling 12-month basis;
- **ANY equity/ownership interest in a privately-held company;**
- **An income that exceeds \$5,000 from rights in intellectual property**, as measured on a rolling 12 month basis;
- **All reimbursed and “sponsored” travel that exceeds \$5,000**, as measured on a rolling 12-month basis.

Excluded from this definition are payments (including travel) received from Inova. Also excluded from this definition are payments received from any of the following entities, provided these payments are received for teaching engagements, lectures, seminars, or services on advisory committees or review panels:

- Government agencies
- US institutions of higher education and research institutes affiliated with them
- Academic teaching hospitals
- Medical centers

Further, you **do not** have to report:

- **Salary**, royalties, travel, or other remuneration **through your employer**
- Income from investment vehicles over which you do not exercise control, such as mutual funds and retirement accounts