**QUICK GUIDE TO ANNUAL DISCLOSURE FOR PHS-FUNDED INVESTIGATORS**

**Step 1:** Login to the online disclosure system at https://tower.dartmouth.edu/apex/groucho/f?p=260 using your Dartmouth NetID and password.

**Step 2:** Select “Yes” for PHS funding. *If you don’t have any PHS funding or are not listed on a PHS application, you don’t need to do the annual disclosure process at this time.*

**Step 3:** Select the first link, “Annual Disclosure of Financial Interests”.

**Step 4:** Click “create a new annual disclosure”.

**Step 5:** Answer the two questions about your (you, your spouse/domestic partner or dependents) management positions and significant financial interests. Read the definitions and examples carefully, as this information has changed significantly. Click “save”.

**If you have answered “no” to the two questions above:**

**Step 6:** You’re done! Don’t forget to update your “annual disclosure” if you receive any new financial interests. You are required to report a new significant financial interest within 30 days.

**If you answered “yes” to the second question above:**

**Step 6:** Proceed to the next page where you will add new entities (e.g. companies) and answer more detailed questions concerning your significant financial interests.

**Step 7:** You will see your newly created financial entity on the next screen. If you have disclosed against financial entities in the past, you may see a list of your financial entities on this screen. You can deactivate entities older than 12 months. For active entities, create a new questionnaire or copy and update an existing questionnaire.

**Step 8:** If you do not need to disclose against additional financial entities, click “review and confirm.” If you wish to disclose against additional financial entities, click “complete another disclosure”. Always click “review and confirm” when you are completely done entering financial entities.

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**FINANCIAL CONFLICTS OF INTEREST IN RESEARCH**

*Information for Investigators*

As of August 24, 2012, Dartmouth has adopted a revised Conflict of Interest Policy. This new Conflict of Interest Policy includes updated standards for the disclosure and review of significant financial interests held by individuals engaged in the design, conduct and/or reporting of research.

This pamphlet is meant to give investigators a brief overview of these new standards, including those which have been adopted in response to the new Public Health Service (PHS) regulations on conflicts of interest.

If you have any questions on the new Conflict of Interest Policy or the online disclosure system, please email rcoi@dartmouth.edu or contact Tammy Hickox (Tammy.M.Hickox@dartmouth.edu; 6-9523) or Jill Mortali (Jill.M.Mortali@dartmouth.edu; 6-0678).
SUMMARY OF MAJOR CHANGES FOR ALL INVESTIGATORS

The definition of a "significant financial interest" has changed. **Investigators will now need to disclose the following as significant financial interests:**

- Income (e.g., individual consulting fees, royalties, honoraria, paid authorship) if > $5000 in the past 12 months or > $5000 expected in the next 12 months.
- Equity interests (investments, stock, debt) of any value in a privately held company or, if in a public company, worth > $5000 alone or in combination with income from the same company.
- Intellectual Property such as inventions, patents/copyrights or rights to receive royalties. (including Intellectual Property managed by the TTO).
- Other circumstances not specifically described which may create an actual or perceived conflict of interest.

You **DO NOT NEED TO DISCLOSE:**

- Salary from Dartmouth/Dartmouth-Hitchcock or from a grant held at Dartmouth/Dartmouth-Hitchcock.
- Income from mutual funds/retirement accounts where the holder does not directly control investment decisions.
- Copyrights in books, primary literature (e.g., journal articles) or presentations for which more than $5000 in income has not been received in the past 12 months/is not expected in the next 12 months.
- Income from seminars, lectures, or teaching engagements, or from service on advisory committees/review panels sponsored by a (1) a federal, state, or local government agency, or (2) a U.S. based institution of higher education, or affiliated academic teaching hospital, medical center, or research institute.

ARE YOU A PHS-FUNDED INVESTIGATOR?

PHS-funded investigators are those who are responsible for the design, conduct, or reporting of a research project which is funded by a PHS agency or an independent sponsor which has adopted the PHS regulations on conflicts of interest in research.** These are as follows:

PHS agencies
- NIH: All Institutes and Centers of the National Institutes of Health
- ACF: Administration for Children and Families
- AoA: Administration on Aging
- AHRQ: Agency for Healthcare Research and Quality
- ATSDR: Agency for Toxic Substances and Disease Registry (Part of CDC)
- BARDA: Biomedical Advanced Research and Development Authority
- CDC: Centers for Disease Control and Prevention
- FDA: Food and Drug Administration
- HRSA: Health Resources and Services Administration
- IHS: Indian Health Service
- SAMHSA: Substance Abuse and Mental Health Services Administration

Other sponsors using PHS RCOI regulations
- ACS: American Cancer Society
- AHA: American Heart Association
- Alliance for Lupus Research
- Arthritis Foundation
- Alliance for Lupus Research
- Patient Centered Outcomes Research Institute (PCORI)
- Susan G. Komen for the Cure®

**Please consult the OSP website for updates to this list as additional agencies and independent sponsors of research have been adopting these regulations on a regular basis.

SUMMARY OF ADDITIONAL CHANGES FOR PHS-FUNDED INVESTIGATORS

In addition to the new definition of "significant financial interest", **investigators with PHS funding are subject to the following changes:**

- **Increased scope of disclosure:** All investigators are currently asked to disclose significant financial interests related to research on a specific project. Under the new policy, PHS-funded investigators must disclose significant financial interests which are related to any of their institutional responsibilities, which may include professional practice, teaching, administrative duties, committee participation, etc.

- **Reportable Financial Conflicts of Interest:** Considerably more information about financial conflicts of interest will need to be reported to PHS funding agencies and made available to members of the public upon request. Reports must be made to funding agencies in advance of expenditure on an affected research grant.

- **Mandatory disclosure of sponsored/reimbursed travel:** Travel which is sponsored by or for which individuals are reimbursed in an aggregate amount above $5,000 in the last 12 months by an outside entity (other than a government entity or a U.S. based higher education institution or affiliated hospital/research institute) must be disclosed before or within 30 days of a trip.

- **Education:** PHS investigators are required to attend a training session on the new regulations before engaging in PHS-funded research, and every 4 years thereafter. If you have not attended a training session or completed the COI Mini-Course through the CITI Program, please see the Office of Sponsored Projects website to register for a session or link to the CITI Program website.