



SIGNIFICANT FINANCIAL INTEREST (SFI) AND FOREIGN OWNERSHIP, CONTROL AND INFLUENCE (FOCI) DISCLOSURE FORM

This form must be completed by all Bradley University ("BU") Investigators ("Investigator") who receive or intend to seek funding from external entities. **The completed form is CONFIDENTIAL** and must be submitted directly to the Office of Sponsored Programs ("OSP"). **DO NOT include this form with other materials when routing a proposal/contract for institutional approval.** Copies of the completed form will be kept in locked files in the OSP office and the Provost's Office.

Employee Full Name (Last, First, MI): _____

Title: _____ Date: _____

Department/Unit: _____ College/Division: _____

Bradley University Policy:

Before submitting a request for funding from an external entity **and** after receiving external funding, Bradley employees serving as sponsored program investigators **MUST**:

- Complete the CITI Conflict of Interest (COI) Course under a BU Learner Group at **least once every three years**.
- Complete the Bradley University's Significant Financial Interest (SFI) and Foreign Influence Disclosure Form at least **once a year**.
 - Submit an updated Significant Financial Interest (SFI) and Foreign Influence Disclosure Form **within 30 days** when a new conflict of interest arises or changes occur to the previously disclosed information.
- Cooperate with actions to manage any identified conflict of interest(s).

Significant Financial Interest Disclosure: All financial interests that appear reasonably related to the **Investigator's institutional responsibilities** during the twelve months preceding this disclosure **MUST** be reported.

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| Yes | No 1) Did the Investigator, the Investigator's spouse, or the Investigator's dependent children receive any remuneration from a publicly traded entity and hold equity interest in the entity as of the date of disclosure that exceeds \$5,000 when aggregated? |
| Yes | No 2) Did the Investigator, the Investigator's spouse, or the Investigator's dependent children receive any remuneration from a non-publicly traded entity that exceeds \$5,000 when aggregated? |
| Yes | No 3) Does the Investigator, the Investigator's spouse, or the Investigator's dependent children hold any equity interest (e.g., stock, stock option, or other ownership interest) in a non-publicly traded entity? |
| Yes | No 4) Does the Investigator, the Investigator's spouse, or the Investigator's dependent children hold intellectual property rights and interests (e.g., patents, copyrights) that generated income related to such rights and interests? Note: Revenue from University-owned intellectual property does not need to be reported. |
| Yes | No 5) Did the Investigator, the Investigator's spouse, or the Investigator's dependent children receive any reimbursed or sponsored travel related to their institutional responsibilities from an entity other than a Federal, state, or local government agency, an institution of higher education as defined at 20 U.S.C. 1001(a), an academic teaching hospital, a medical center, or a research institute that is affiliated with an institution of higher education? |

Foreign Influence Disclosure: Possible conflicts of interest or commitment due to interactions with foreign governments, instrumentalities, or entities, including foreign government-sponsored talent recruitment programs that occurred during the twelve months preceding this disclosure, **MUST** also be reported.

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| Yes | No 6) Does the Investigator have affiliations, appointments, or employment at a non-US entity, including consulting and/or advising for a non-US entity? |
| Yes | No 7) Has the Investigator participated in a foreign talent recruitment (or similar) program or foreign support provided through an intermediary? |

- Yes No 8) Did the Investigator have travel paid or reimbursed by a non-US entity, including from academic and healthcare institutions, governments, companies, or nonprofits, of any dollar amount?
- Yes No 9) Did the Investigator receive research support from or have a research engagement with a non-US entity for a project not routed through Bradley University?
- Yes No 10) Did the Investigator receive in-kind resources (e.g., lab, office, equipment, materials, reagents, personnel, etc.) provided by a non-US entity?

If you answered **yes** to any of the questions above (1-10), please provide the following: a) the entity's name, b) the last date of affiliation or date of payment/resources received, c) if applicable, the amount/value of the payment/resources, and d) the reason for your involvement. Attach additional signed pages as needed.

Section IV. Employee Certification

I affirm:

I hereby agree to comply with Bradley University's Sponsored Programs Conflict of Interest Policy, and the information I have provided in this Form is complete and accurate to the best of my knowledge.

Signature: _____

Date: _____

RETURN COMPLETED FORM TO:
The Office of Sponsored Programs
Bradley Hall Room 1, osp@bradley.edu

PLEASE DO NOT INCLUDE THIS PAGE WHEN SUBMITTING THE FORM

Definitions

Sponsored Program: *"A sponsored project is an activity sponsored, or funded, by an external organization, such as a federal, state, or private organization or agency."³ Characteristics of a sponsored project include a specific scope of work or set of aims, financial accountability (i.e., the funds must be separately budgeted and accounted for), a specific performance period, and deliverables.³*

Investigator: *"the project director or principal Investigator and any other person, regardless of title or position, who is responsible for the design, conduct, or reporting of"⁴ both active or proposed externally-funded projects.*

Institutional Responsibilities: *"[A]n Investigator's professional responsibilities on behalf of the Institution, and as defined by the Institution in its policy on financial conflicts of interest, which may include, for example, activities such as research, research consultation, teaching, professional practice, institutional committee memberships, and service on panels such as Institutional Review Boards or Data and Safety Monitoring Boards."⁴*

Significant Financial Interest: *A financial interest "of the Investigator (and those of the Investigator's spouse and dependent children) that reasonably appears to be related to the Investigator's institutional responsibilities."⁴*

*"The term significant financial interest does **not** include the following types of financial interests:*

- [S]alary, royalties, or other remuneration paid by the Institution to the Investigator if the Investigator is currently employed or otherwise appointed by the Institution, including intellectual property rights assigned to the Institution and agreements to share in royalties related to such rights;*
- any ownership interest in the Institution held by the Investigator, if the Institution is a commercial or for-profit organization; income from investment vehicles, such as mutual funds and retirement accounts, as long as the Investigator does not directly control the investment decisions made in these vehicles;*
- income from seminars, lectures, or teaching engagements sponsored by a Federal, state, or local government agency, an Institution of higher education as defined at [20 U.S.C. 1001\(a\)](#), an academic teaching hospital, a medical center, or a research institute that is affiliated with an Institution of higher education;*
- or income from service on advisory committees or review panels for a Federal, state, or local government agency, an Institution of higher education as defined at [20 U.S.C. 1001\(a\)](#), an academic teaching hospital, a medical center, or a research institute that is affiliated with an Institution of higher education."⁴*

Foreign Influence: *A foreign entity with the power to direct or influence the management or operation of an individual or organization or lead to unauthorized access to sensitive information.⁵*

Foreign Talent Recruitment Program: *"program, position, or activity that includes compensation in the form of cash, in-kind compensation, including research funding, promised future compensation, complimentary foreign travel, things of non de minimis value, honorific titles, career advancement opportunities, or other types of remuneration or consideration directly provided by a foreign country at any level (national, provincial, or local) or their designee, or an entity based in, funded by, or affiliated with a foreign country, whether or not directly sponsored by the foreign country, to an individual, whether directly or indirectly stated in the arrangement, contract, or other documentation at issue."¹*

References:

- 1) whitehouse.gov/wp-content/uploads/2024/02/OSTP-Foreign-Talent-Recruitment-Program-Guidelines.pdf
- 2) <https://www.fbi.gov/file-repository/foreign-malign-influence-and-higher-education-101824.pdf/view>
- 3) <https://ras.mit.edu/grant-and-contract-administration/sponsored-projects-basics>
- 4) ecfr.gov/current/title-42/chapter-I/subchapter-D/part-50/subpart-F
- 5) ecfr.gov/current/title-32/subtitle-A/chapter-I/subchapter-D/part-117/section-117.11
- 6) whitehouse.gov/wp-content/uploads/2022/01/010422-NSPM-33-Implementation-Guidance.pdf