**Investigator Decision Tree: The Who, What, Where, and When for Disclosure Requirements at Penn***

**Who must disclose?**  
*Am I an Investigator:* Project Director or Principal Investigator or any other person, regardless of title or position, who is responsible for the design, conduct, or reporting of Research, whether externally or internally funded, or proposed for such funding, which may include, for example, collaborators or consultants?

- **NO**  
  - **No disclosure required**

**What triggers my obligation to disclose?**  
Do I have SFIs that could affect or be affected by the research, including relationships with one or more Outside Organizations whose interests could affect/be affected by the research?

- **NO**  
  - **No disclosure required**
  - **YES**  
    - **What type of SFIs could be affected by this research?**
      - Receive payments from the research sponsor or from a company that provides a drug, device or other product being studied, or has a some other role related to this research
      - Have a Fiduciary role for, or have equity in, a company with a financial interest in this research
      - Have an inventorship interest in IP that is being tested, evaluated, developed in, or its commercial value could be affected by, this research.

**What are SFIs?**  
Significant Financial Interests (SFIs)

- Payments from a public company for past 12 months + current equity that when aggregated are > $5,000
- Payments for past 12 months > $5,000 from any company
- Any equity in a non-public outside entity
- Income from IP rights not assigned to Penn
- Any Clinical Trial IP whether or not assigned to Penn
- Any Fiduciary Role for an entity

**Is the research funded by the Public Health Service?**

- **NO**  
  - **No disclosure required**
  - **YES**  
    - **What are SFIs and Travel related to my Penn responsibilities?**
      - I must submit a disclosure even if I do not have SFIs or travel to report.

**MANDATORY obligation to disclose:** SFIs and Travel related to my Penn responsibilities. I must submit a disclosure even if I do not have SFIs or travel to report.

**Where do I disclose?**

- To RIO in the Financial Interest Disclosure Electronic System (FIDES)
- To my school, in the Public Health Service Financial Interests and Travel Statement (PHS-FITS)

**When do I disclose (or submit an Addendum) in FIDES?**

- At the time of proposal submission
- At the time of IRB protocol submission
- When I acquire or have a change in my SFIs
- When a transaction is initiated by the Center for Technology Transfer for technology in which I have an inventorship or financial interest
- Upon notification to disclose from my school or RIO

**When do I complete a Grant Relatedness Assessment in PHS-FITS?**

- For new proposals
  - At Just-in-Time (but no later than at the time the NOA is issued)
- For awarded grants
  - When NOA is received (if I have not submitted a Relatedness Assessment at Just-in-Time)
  - When I report a new SFI in PHS-FITS (but not a change in a previously reported SFI)
  - If there is a change in the relatedness of a previously reported SFI to a specific grant

A separate Grant Relatedness Assessment must be submitted for EACH grant

- Upon completion of your Grant Relatedness Assessment, your school will notify you if an additional disclosure in FIDES is required

**When do I disclose my SFIs and Travel in PHS-FITS?**

- If I am an investigator on any pending or awarded PHS proposal
- I must update my SFIs within 30 days of acquiring a new SFI (e.g., activity with a new company) and Travel on a regular basis
- I must recertify my SFIs and Travel annually

Your SFIs and Travel will be saved for future updating

**To submit a disclosure in FIDES, click here**

**To submit a disclosure in PHS-FITS, click here**

*Click here to read Penn’s Policy on Conflicts of Interest Related to Research*