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?

Yes

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.

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?

Yes

Is the research funded by the Public Health Service?

Yes

Where do I disclose?

To my school, in the Public Health Service Financial Interest and Travel Statement (PHS-FITS)

No

No disclosure required

No

What are SFIs?

Significant Financial Interests (SFIs)

- Payments from a public company for past 12 months + current equity that when aggregated are > $5,000
- Any equity in or payments for past 12 months > $5,000 from 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

Where do I disclose?

To OVPR in the Financial Interests Disclosure Electronic System (FIDES)

When do I disclose 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 OVPR

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

- An initial disclosure must be submitted after 8/24/12 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

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 submitting a progress report for Non-Competing Continuations
  - When I report a new SFI in PHS-FITS
  - If an outside entity previously reported as an SFI without a relationship to the research now has a relationship to the research
  - Annually

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

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