Special Disclosure Process for PHS-funded Projects – How to submit a PHS Financial Interests and Travel Statement (PHS-FITS)

Prior to participating in research that will be funded by the Public Health Service (PHS), Penn’s FCOI Policy requires Investigators (the PD/PI and any other person, regardless of title or position, who is responsible for the design, conduct or reporting of research) to submit a PHS-FITS to their Schools.

**PHS-FITS Overview.** You are being asked to complete a disclosure of Significant Financial Interests (SFIs) and Travel in PHS-FITS because you have been identified as an Investigator for one or more proposals funded or to be funded by the PHS. PHS-FITS can be accessed at is: [Financial Interest and Travel Statement (PHS-FITS)]

You must also complete a separate Grant Relatedness Assessment for each PHS award and each PHS proposal that likely will be funded in the near future.

All Investigators must submit disclosures in PHS-FITS, even if they have no SFIs or Travel to report.

Before you log in to PHS-FITS, you should have information available about your extramural activities and investments for the past 12 months that derive from your professional standing or field of discipline at Penn. These may include equity interests, payments for consulting or other services, IP interests and fiduciary responsibilities. You should also have information available about reimbursed travel and travel that was paid on your behalf for the past 12 months.

**Technology Tips.** Icons and buttons used in this program

- **Add more:** Allows you to add additional entries
- **☐ None:** Select this box, if applicable
- **Edit:**
- **Delete:**
- **Financial Interest elimination date calendar:**
- **Validation error. Click or hover over for specific action required:**
- **Show questions and answers**
- **Hide questions and answers**

**FIRST TIME USERS:**

**Process for Submission of SFIs.** When you log in to PHS-FITS, you are at the Financial Interests page which asks about your SFIs, regardless of their relatedness to a particular PHS grant.

Read the “Do Include” and “Do Not Include” bullet points.

Questions 1-4 all require a response. Click the box next to “None” if applicable.
Office of the Vice Provost for Research

Question 1 (Equity + Payments from public companies) - Only list a company if the combination of payments + equity is > $5,000. You do not have to disclose every stock - only stock in companies that you know conduct or plan to conduct business related to your field of discipline (Example – If you are a dermatologist and you hold stock in X Company which you know makes a drug for a skin disorder, you should disclose. If you hold stock in a utility company, you need not disclose).

Question 2 (Payments from outside entities) - List any entities not listed under Question 1 from which you receive payments > $5,000. You may have disclosed such relationships in your School’s annual extramural report and typically would have received a 1099 from each entity.

Question 3 (Equity in private companies) - You only must disclose equity held in your own name and not your inventor’s share of the equity pool held by Penn per the University’s Patent Policy.

Question 4 (IP not assigned to Penn) - Do not provide $ received – just describe the IP.

Save your answers by clicking “Next” or clear your answers and start over by clicking “Clear.”

Process for Submission of Travel. You are required to list travel within the past 12 months regardless of its value, and even if you have not reported any SFIs under the Financial Interests page. If you have no travel to report, click “I have no reimbursed or sponsored travel to report.”

Read the “Do Not List” bullet points.

You may aggregate travel if sponsored by the same entity for the same purpose and same destination. Otherwise, each trip must be entered on its own line.

For Destination, you do not need to list travel within the Philadelphia metropolitan area.

Save your answers by clicking “Submit” or clear your answers and start over by clicking “Clear.”

You will be asked whether you wish to complete a Grant Relatedness Assessment for any PHS award that is funded or will be funded in the near future. Otherwise, you may log out of PHS-FITS.

Process for Submission of Grant Relatedness Assessments

You must submit a separate Grant Relatedness Assessment for each PHS award and each PHS proposal that likely will be funded in the near future. You do not need to submit a Grant Relatedness Assessment on proposals that are unlikely to be funded (but you still must have an up to date disclosure of your SFIs and Travel at the time of proposal submission).

Choose the grant proposal from the drop down menu or select “Proposal not Listed” and enter your 8-digit ORS Institution #. If you do not know the correct institution number, check with your Business Administrator.
Office of the Vice Provost for Research

Answer questions 1-5 as they apply to a particular grant. All questions require a response.

**Questions 1-2** (related to entities listed under the Financial Interests page) - By clicking Yes to questions 1 or 2, you can view the entities you identified.

**Question 3** (Fiduciary role) - You may identify a company, even if not listed under the Financial Interests page.

**Question 4** (IP not assigned to Penn) - Only check Yes if you received any payments during the last 12 months.

**Question 5** (Clinical Trial IP) - Check Yes if this research is a Clinical Trial (any research study that prospectively assigns human participants or groups of humans to one or more health-related interventions to evaluate the effects on health outcomes) and you are an inventor or otherwise have a financial interest in the IP that is a focus of this research, regardless of whether it has been licensed and even if owned by Penn.

You may “Save as Draft” and complete at another time. Otherwise, certify your answers by clicking “Submit.” You will now see a “submission date” for this grant in the list of grants.

If you wish to submit Grant Relatedness Assessments for additional grants, click “New Grant” highlighted in yellow. Otherwise, you may log out.

**RETURN USERS:** When you log in, you are at the Financial Interests tab.

If you wish to complete a Grant Relatedness Assessment for a specific awarded grant or one that is likely to be funded in the near future, you must first re-certify or update your Financial Interests for the past 12 months and click “Submit.” Next, you must re-certify or update your Travel (under the Sponsored Travel tab) to reflect the past 12 months and click “Submit.” Then click the Grant Relatedness tab.

To delete a financial interest, click on the “FI elimination date” calendar icon. Do not delete any currently held equity or any entity from which you received payments within the past 12 months.

**What happens after submission of my Grant Relatedness Assessment?** You will receive an email from your School’s FCOI officer if additional information or action is required, if you must submit a more specific disclosure to the Office of the Vice Provost for Research in FIDES, or if no further action is required.

**Update Requirements.**

**New SFIs.** You must update your SFIs within 30 days of discovering or acquiring a new SFI not previously reported in PHS-FITS. You also must update all your Grant Relatedness Assessments to assess possible relatedness of each grant to this new SFI.
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New PHS proposals / awards (including transfer of a grant from another institution to Penn). You must update / re-certify your SFIs and Travel and then complete a Grant Relatedness Assessment for every PHS award or proposal likely to be funded in the near future.

Other event triggers for completion of PHS-FITS:
• When the annual progress report is submitted but not less than annually
• At time of IRB protocol submission if PHS-funded
• Upon being added as an Investigator to an ongoing project
• As required in any communication from the Office of the Vice Provost for Research, your School, or the University

Other things to know about PHS-FITS
• By hovering your mouse over some of the headings, you can see further guidance regarding answering questions.
• You may delete entries in the Financial Interests and Travel tabs within 24 hours of entry. After 24 hours, you may edit your responses in both tabs.

Please contact Vicki Ricart, PHS FCOI Administrator, at (215) 746-4775 or by e-mail at phs@exchange.upenn.edu for any questions.