

### When disclosing:

- **Read this Disclosure & COI Training Page, then click the checkbox at the bottom of the page to confirm that you’ve read it,**
- **On the Disclosure Details Page:**
  - **1) answer the organizational conflict of interest question,**
  - **2) edit, update, and/or archive previous disclosures as needed,**
  - **3) add new outside activities, relationships, and interests, and**
  - **4) provide your Open Researcher and Contributor ID (ORCID) if available/known**
- **On the Attestation Page, attest and submit your disclosure in three steps:**
  - **1) click the Attestation checkbox in the middle of the page,**
  - **2) select “Yes” to indicate you’re ready to submit the disclosure, and**
  - **3) click “Save” or “Finish” to submit.**
- **For additional information, see [this video demonstration](#).**

## Disclosure & COI Training

The University of Michigan allows and encourages outside activities, relationships, and interests with companies and organizations external to the University that enhance the missions of the University ([Regents Bylaw 5.12](#) and [U-M Faculty Handbook section 9.E](#)).

### Why must I disclose outside activities, relationships, and interests?

Disclosing your [outside activities, relationships, or interests](#) (henceforth referred to as “outside activities”) in M-Inform helps ensure the transparency and integrity in your U-M research and professional work.

Disclosure of outside activities is also an institutional requirement under U-M policy ([SPG 201.65.1](#)) and [unit policy](#). For **U-M researchers**, it’s also required by the U-M Office of Research, the State of Michigan, and federal agencies (e.g., PHS, NIH, NSF, DOE) for sponsored research funding ([COI Policies](#)).

Unreported outside activities may impact both you and U-M by:

- Introducing bias, or the appearance of bias, into your research
- Increasing the possibility that the results of the research will be questioned
- Losing the ability to conduct research through the suspension/termination of the existing projects and/or through the reduction/loss of future funding opportunities
- Damaging reputations (professional and/or organizational)

By disclosing outside activities in M-Inform, you will have done your part to assist in safeguarding research and to demonstrate compliance with U-M and sponsor requirements.

**What outside activities, relationships, and interests do I need to disclose?**

Report all paid and unpaid outside activities, relationships, interests, and intellectual property for you, your spouse, domestic partner, and/or dependent children (i.e., family members) with an [outside entity/organization](#) (including foreign institutions, governments, and companies) when:

- The outside activity relies on or utilizes the same expertise as your U-M teaching, research, clinical, and public service responsibilities or is similar to your area of expertise, scholarship, employment; **OR**
- The outside activity has the potential to influence your U-M duties; **OR**
- The outside entity [conducts business with U-M](#).

Even if your U-M appointment is less than full-time or less than 12 months, you are required to report all applicable activities outside your U-M appointment.

**Report** ([printable version](#))

INTERNATIONAL ENGAGEMENT	ACTIVITIES/RELATIONSHIPS (PAID AND UNPAID)
<ul style="list-style-type: none"> <li>• Appointment, employment, or visiting scholar at a <a href="#">non-US entity</a> (e.g., teaching a class/course, role at start-up, directing a program, lab work, or other services typical for an employee or professor)</li> <li>• Participation in a <a href="#">foreign talent recruitment (or similar) program</a> or support provided by the program through an intermediary</li> <li>• Consulting and/or advising for a non-US entity</li> <li>• Travel paid or reimbursed by a non-US entity including academic and healthcare institutions, governments, companies, or non-profits (any dollar amount)</li> <li>• Research support from or research engagement with a non-US entity that did not route through U-M</li> <li>• Grant reviewer or other advisory services for non-US institutions, organizations, and entities</li> <li>• In kind resources (e.g., lab, office, equipment, materials, reagents, personnel, etc.) that you have access to or are using outside of your U-M role provided by a non-US entity</li> <li>• Venture or other capital financing</li> </ul>	<ul style="list-style-type: none"> <li>• Consulting</li> <li>• Advisory role (e.g., scientific advisory board, data and safety monitoring board)</li> <li>• Board of Directors, Corporate Officer, Trustee, or other position with fiduciary responsibility</li> <li>• Leadership role in a professional society</li> <li>• Appointment, employment, or visiting scholar at a domestic or <a href="#">non-US entity</a> (e.g., teaching a class/course, role at start-up, directing a program, lab work, or other services typical for an employee or professor)</li> <li>• Speaking engagements (except as noted in the Do Not Disclose examples below)</li> <li>• In-kind resources (e.g., lab, office, equipment, materials, reagents, personnel, etc.) that you have access to or are using outside of your <a href="#">U-M role</a> provided by a non-US or domestic entity</li> </ul>

- Non-U.S. professional society participation (e.g., membership, leadership, travel, etc.)

<p><b>PAYMENTS/LOANS/REIMBURSEMENTS</b></p> <ul style="list-style-type: none"> <li>• Royalties, milestones, option fees</li> <li>• Payments from professional societies for services</li> <li>• Loans and loan repayment</li> <li>• Travel expenses reimbursed directly to you of \$5,000 or more, in aggregate, by a single domestic outside entity in a 12-month period</li> <li>• Gifts from outside entities</li> <li>• Venture or other capital financing</li> </ul>	<p><b>OWNERSHIP INTEREST (EQUITY, STOCK, STOCK OPTIONS)</b></p> <ul style="list-style-type: none"> <li>• Ownership (e.g., stock, stock options, LLCs, etc.) in a company (including start-up companies) related to your U-M role/responsibilities</li> <li>• Ownership of 5% or greater of a publicly-traded company that <a href="#">conducts business with the U-M</a> (e.g., purchases, sponsoring research, contracts, etc.)</li> </ul>
<p><b>INTELLECTUAL PROPERTY (IP)</b></p> <ul style="list-style-type: none"> <li>• Optioned or licensed IP developed at U-M or outside U-M</li> <li>• Software apps marketed by a company</li> <li>• Open source IP (e.g. software)</li> <li>• Royalties, milestones, option fees</li> </ul>	<p><b>ADDITIONAL ROLES</b></p> <ul style="list-style-type: none"> <li>• Research at an outside entity (that is not part of your U-M research)</li> <li>• Editor of journals or other publications not routed through U-M</li> <li>• Expert witness or other legal service</li> <li>• Grant reviewer (except as noted in the Do Not Disclose examples below)</li> </ul>

**Do Not Report (exception examples)**

<p><b>INTERNATIONAL ENGAGEMENT</b></p> <ul style="list-style-type: none"> <li>• Visitors/trainees working in your U-M lab</li> <li>• Financial support from a <a href="#">non-US entity</a> received by visitors/trainees in your lab</li> <li>• Collaborations with <a href="#">non-US persons</a> that are managed within your <a href="#">U-M role</a> (including NIH Foreign Components)</li> <li>• In-kind support you provide to someone at a non-US entity</li> </ul> <p>Although you are not required to disclose these activities in M- Inform, you may be required to report them in Current/Pending or Other Support documentation to funding agencies (e.g., NSF, NIH, etc.)</p> <p><b>PAYMENTS/GRANTS/CONTRACTS</b></p>	<p><b>ACTIVITIES/RELATIONSHIPS</b></p> <ul style="list-style-type: none"> <li>• Speaking engagement and/or travel (paid or unpaid) that is:             <ul style="list-style-type: none"> <li>○ Supported by a <b>U.S.</b> federal, state, or local government agency</li> <li>○ Supported by a <b>U.S. academic institution that is public or non-profit and accredited</b> <ul style="list-style-type: none"> <li>▪ Or said academic institution’s affiliated hospital, medical center, or research center</li> </ul> </li> </ul> </li> <li>• U.S. professional society             <ul style="list-style-type: none"> <li>○ Membership</li> <li>○ Service that is not paid nor involves paid travel</li> </ul> </li> </ul>
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<ul style="list-style-type: none"> <li>• Payments for service as a <b>U.S.</b> federal, state, or local government agency grant/study section reviewer</li> <li>• Effort (paid or unpaid) on a research or sponsored project routed through U-M (e.g., sponsored research, other sponsored activities, U-M funded research, unfunded agreements, or other payments to U-M resulting from a U-M contract</li> <li>• Financial support (domestic or foreign) received by trainees in your lab (although foreign support may be required in Other Support reports to funding agencies)</li> <li>• Domestic travel (under \$5,000 in a 12-month period from a single entity*)</li> <li>• Travel paid by U-M or yourself</li> <li>• Gifts made/to processed by U-M</li> </ul>	<ul style="list-style-type: none"> <li>○ Speaking at or travel to national annual meetings, forums, congresses (under \$5,000 in a 12-month period from a single entity*)</li> <li>○ Activities or relationships that are not related to your U-M expertise</li> <li>• Reviewer of books or journal articles</li> <li>• Grant reviewer for U.S. governmental agencies (any dollar amount) or U.S. non-profit entities (under \$5,000 in a 12-month period from a single entity*)</li> </ul>
<p><b>INTELLECTUAL PROPERTY (IP)</b></p> <ul style="list-style-type: none"> <li>• Inventions/IP that have not been optioned, licensed, or reassigned even if there is a patent</li> <li>• Software apps that are not marketed or sold</li> <li>• Book Royalties</li> </ul>	<p><b>OWNERSHIP INTEREST</b></p> <ul style="list-style-type: none"> <li>• Ownership (e.g., stock, stock options) less than 5% of a publicly-traded company that is not related to your U-M responsibilities or research</li> <li>• Mutual funds, retirement funds, and similar investments where you do not control the investment decisions within the portfolios at the level of specific companies</li> </ul>

\* Keep in mind that if you travel, speak, and/or perform grant reviews for a single domestic entity multiple times over the course of any rolling 12-month period, the \$5,000 threshold may be exceeded and such activities will need to be reported. Travel, speaking, and/or performing grant reviews for a **non-US entity** should be disclosed, regardless of dollar amount.

**How often do I have to disclose?**

At least annually at the start of the University’s fiscal year (July 1) and within 30 days of a new outside activity or change to a previously reported activity.

**What happens with my disclosure?**

Your unit reviews your disclosure for compliance with U-M and unit policies and [conflicts of commitment](#) (time/effort) with your professional duties. A U-M COI Office may also review your disclosures to determine if [conflicts of interest \(COI\)](#) exist between your outside activity and your U-M research, sponsored projects, or intellectual property. If a COC or COI exists, a management plan may be established. A U-M COI Office and/or the Office of Research and Sponsored Projects (ORSP) may also review your disclosures for inclusion in documentation required by federal sponsors.

**Will my disclosure be private?**

Disclosure information is subject to release outside the U-M under the State of Michigan Freedom of Information Act (FOIA) and certain funding agency requirements. Disclosure information may be shared within the U-M, as appropriate.

**Who can I contact if I have questions?**

Email: [COI.Support@umich.edu](mailto:COI.Support@umich.edu)

**Where can I get more information?**

- [M-Inform instructions](#)
- [General COI and process information](#)
- [COI Policies](#)
- [Public Health Service \(including NIH\) financial COI regulations](#)
- [Department of Energy Interim Conflict of Interest Policy](#)

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**Training Acknowledgement:**

**I certify that I have read the training above and understand that it is my responsibility to fully disclose my outside activities, relationships, and interests in accordance with U-M, federal, and other funding sponsors COI policies.**

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## Disclosure Details for Jane Discloser

### [Organizational Conflict of Interest](#) Disclosure (in the past five years)

\*1. Excluding service on proposal review panels, in the past five years, have you provided consulting or advisory services to any U.S. federal agency where you had access to confidential or proprietary technical information?

Yes  No [Clear](#)

Please list the agency, the program you consulted or advised on, and describe the service you provided (note: if this happened within the past 12 months, this must be disclosed as an individual outside activity below):

### Individual Outside Activity Disclosure (current or in the past 12 months)

\*2. Do you have a spouse, domestic partner, and/or dependent children (i.e., family member) currently employed at U-M?

Yes  No [Clear](#)

\*3. Do you and/or your [family members](#) have any paid and/or unpaid [outside activities, relationships, interests,](#) or [intellectual property](#) with an [outside entity/organization](#), foreign or domestic, that:

- Rely on or utilize the same expertise as your U-M teaching, research, clinical, and public service responsibilities; **OR**
- Are similar to your area of scholarship or employment; **OR**
- Have the potential to influence your U-M duties; **OR**
- Are with outside entities that [conduct business with U-M](#).

Yes  No [Clear](#)

\*3.1 Do you have any active **National Institutes of Health** (NIH) awards (direct or prime funding) **OR** have you submitted or do you plan to submit a proposal for NIH funding for your U-M research during the current fiscal year (July 1 - June 30)?

Yes  No [Clear](#)

\*4. Do you have an Open Researcher and Contributor ID (ORCID)?

Yes  No  Unsure [Clear](#)

**\* 4.1 Enter your ORCID Number(s).**

**Pending**

View/Edit	Organization	Relationship	Role	Start Date	End Date	Ongoing?	Days	Total Value	Last Updated	Archive
<input type="button" value="Edit"/>	Pfizer	•	Consultant	03/10/2018		Yes	4	\$20,000 - \$39,000	07/07/2019	<input type="button" value="X"/>

**Reviewed**

Modify View	Organization	Relationship	Role	Start Date	End Date	Ongoing?	Days	Total Value	Last Updated	Archive
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There are no items to display

**Archived**

Restore	View	Organization	Relationship	Role	Start Date	End Date	Ongoing?	Days	Total Value	Last Updated
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There are no items to display

Select the outside entity/organization involved in this activity, relationship, or interest:

If you are unable to find the outside entity/organization, please enter the legal name of the outside entity/organization:

## Disclosure of Outside Entity for Jane Discloser

\* 1. To the best of your knowledge, is this a non-US entity (e.g., an institution, government, or company located outside the U.S.)?

Yes  No [Clear](#)

\* 1.1. In what country is this entity located?

\* 1.2 Do you perform the work for this entity outside the U.S.?

Yes  No [Clear](#)

\* 1.3. Upload all contracts, grants, appointment/acknowledgement letters, statements of work, and any other agreements related to your outside activities with this non-US entity (original and English translations).

[+ Add](#)

\* 2. Select the choice that best describes this outside entity:

- Publicly Traded Company
- Non-Publicly Traded Company
- Governmental Agency
- Academic Institution
- Non-Profit Organization
- Other

[Clear](#)



\* 3. Select who this outside activity, relationship, or interest is for:

- Self
- Family Member (spouse/domestic partner or dependent)
- Both (self and family member)

\* 4. Provide the start/initial date for the outside activity, relationship, or interest:

\* 5. Is this outside activity, relationship, or interest ongoing?

- Yes
- No
- [Clear](#)

\* 5.1 Please enter the end date

\* 6. Estimated professional effort (in days) engaged in this activity, relationship, or interest for the current fiscal year (ending June 30). (If you are only disclosing an outside activity for your spouse or dependent, enter 0 days for professional effort.)

\* 7. Provide details about this outside activity, relationship, or interest. Check ALL that apply below. (For assistance, review the [Outside Activity Disclosure Guidance](#).)

**Note:** For information on which of these activities also need to be reported in sponsor documentation (e.g., Biosketch, Other Support, Current & Pending), review [this Matrix](#).

Appointment (e.g., adjunct, honorary, directorship) or visiting scholar arrangement

Select all that apply.

- Adjunct
- Honorary
- Director
- Visiting Appointment (e.g., scholar, professor, instructor, researcher)
- Other (e.g., invited guest)

Disclosure Questions

\* Is there a written agreement?  Yes  No [Clear](#)

\* Provide the title and describe the expectations of your role:

Conducting or participating in non-UM research projects (paid or unpaid) **not** processed through a U-M system (e.g., not captured on a PAF, AWD, SUBK, UFA, Development, Procurement)

\* Provide the project titles/names and aims:

\* Provide the name of the entity sponsoring the research:

In-kind resources (e.g., lab, office, equipment, materials, reagents, personnel, etc.) provided by this entity that you have access to or are using outside of your [U-M role](#)

\* Please describe:

[Talent recruitment \(or similar\) program](#) involvement/support (direct or indirect)

\* Was the contract with you directly?  Yes  No [Clear](#)

\* Describe the expectations of your responsibilities:

Travel (paid directly or reimbursed to you by the outside entity)

\* *Enter information about each trip on a separate line in the table. Click the Add button to enter trip details. To make changes, click the Update button next to the information to be changed.*

Date	Duration	Destination (city, state, country)	Purpose	Event Organizer (if other than the outside organization)
There are no items to display				

Intellectual Property (IP) – The outside entity owns or has optioned or licensed [Intellectual Property](#) (including software whether accessed by the company via an open source license or other route) that you and/or your family member invented/created and/or in which you would otherwise have an economic interest

Yes  No [Clear](#)

Disclosure Questions

\* Is it U-M IP (if you are not sure, contact Innovation Partnerships)?  Yes  No [Clear](#)

\* Are you using this intellectual property in your U-M research?:  Yes  No [Clear](#)

Equity interest, ownership, stock, stock options, or partnership interest

5% or greater

Less than 5%

[Clear](#)

\* Is the dollar value of the equity known? If yes, please include in question 9.

Yes  No [Clear](#)

Employee

\* Title

\* Percent FTE/Effort

Board of director (including non-profits) or leadership/management/fiduciary role (e.g., CEO, President, Vice President)

Board of Directors

Member

Officer (e.g., secretary, treasurer, vice president, president, chair, etc.)

CEO

President

Vice President

Other

\* Please describe:

Disclosure Questions

Consultant

\* Is there a written agreement?  Yes  No [Clear](#)

\* Does this consulting activity involve the design, conduct, or reporting of research?  Yes  No [Clear](#)

\* Describe your consulting role:

Advisor (including scientific, strategic, medical advisory board membership)

\* Describe your advisory role and responsibilities:

Name and purpose of the committee(s), if applicable:

Speaking engagements

\* Describe the nature of the speaking engagement(s) (e.g., topic, honoraria, relatedness to U-M research):

Teaching a class/course (if you have any type of appointment associated with this activity, please also select appointment above)

\* Provide the course name(s):

Editorial position (e.g., editor of journals or other publications)

\* Provide name(s) of journal/editorial and specify your role/title(s):

Expert witness or other legal service

\* Provide a brief description:

Reviewer (e.g., site, program, grant reviewer with [exceptions](#))

Other (e.g., loan to or from outside organization, volunteer/community service, venture or other capital financing)

\* Provide details about your interest, activity, or relationship:

8. If there is any other relevant information, please provide.

\* 9. Select the range of the aggregated value (excluding travel) received from this entity in the past 12 months including the current value of any equity (if public or known):

\* 10. Is this outside entity/organization...

\* funding or supporting your U-M research (including salary, supplies, equipment, etc.)?

Yes  No [Clear](#)

\* providing or supplying a product (e.g., an app, device, drug, compound, software, survey, evaluation) used in your U-M research project(s) either for free (e.g., donated) or at a cost?

Yes  No [Clear](#)

\* a subcontractor supported by your U-M research?

Yes  No [Clear](#)

\* involved in your U-M research in a manner not listed above?

Yes  No [Clear](#)

\* Please explain:

\* 11. Does the research involve human subjects?

Yes  No [Clear](#)

## Attestation

- I have read and agree to abide by the [U-M policies and guidelines](#) and all applicable sponsor requirements governing outside activities, relationships, and interests, conflicts of interest, and conflicts of commitment.
- The information I provided about my outside activities, relationships, and interests is complete and accurate to the best of my knowledge.
- To the best of my knowledge, the disclosed outside activities, relationships, and interests are allowable under U-M policies, do not interfere with my primary obligations to U-M, and do not involve more than incidental use of U-M resources (e.g., facilities, personnel, equipment, etc.).
- I will update my disclosure promptly (within 30 days) of any change to my previously disclosed outside activities, relationships, and interests or to add a new outside activity, relationship, or interest.
- I understand that I may be subject to disciplinary action up to and including termination of employment for non-compliance with U-M COI policies and outside activity, relationship, and interest disclosure guidelines.
- False, fictitious, or fraudulent statements or claims (including omissions) may result in criminal, civil, administrative, sponsor, or U-M actions.
- If funded by or applying for funding from any Federal Agency, including but not limited to the Department of Energy, the National Institutes of Health, the National Science Foundation, and the Department of Defense, I am certifying that I understand that this Disclosure is required to obtain funding from the U.S. Government. I certify to the best of my knowledge and belief that the information contained in this Disclosure Statement is true, complete, and accurate. I understand that any false, fictitious, or fraudulent information, misrepresentations, half-truths, or omissions of any material fact, may subject me to criminal, civil or administrative penalties for fraud, false statements, false claims, or otherwise. (18 U.S.C. §§ 1001 and 287, and 31 U.S.C. 3729-3730 and 3801-3812). I further understand and agree that (1) the statements and representations made herein are material to U.S. Government’s funding decision, and (2) I have a responsibility to update the disclosures during the period of performance of the award should circumstances change which impact the responses provided above.

**\* I attest that I have read and accept the above:**

**\*Are you ready to submit your disclosure for review?**

**Selecting “Yes” and clicking “Save” or “Finish” will immediately submit your disclosure for review.**

**If you just wish to save the information you have entered and submit it at another time, select “No” and click “Save” or “Finish”.**

Yes  No [Clear](#)

Once you accept the attestation above and click FINISH, your disclosure will be routed to the appropriate reviewer.