Outside Financial Interest Disclosure: Overview and Form

Certain federal funding agencies and other Sponsors may require disclosure of Outside Financial Interests (OFIs) at time of proposal submission for grant/contract proposals. Any individual who is required to fill out a Disclosure Form must update the form within 30 days of any change in or addition of an OFI. This requirement holds for the entirety of the award period.

When you are done filling out the form, please sign and date the form and send to FCOI@bard.edu. If you have any questions about this form or the policy, please contact the Associate Dean for Regulatory Compliance, Brandt Burgess, at bburgess@bard.edu or 845-752-2357.

What should be reported?

To ensure compliance with federal regulations (and other Sponsor’s requirements when specified), Bard requires you to disclose any of the following OFIs when prompted by Sponsor requirements:

- **Publicly Traded Companies**: Combined equity value (ownership of stock, options, etc.) and income exceeding $5,000 (or the equivalent cash value) from any one entity when aggregated over the preceding 12 months for you and your immediate family that appears to be related to the research or activities described in the grant/contract proposal.

- **Privately Held or Non-profit Companies**: Ownership in any dollar amount or income exceeding $5,000 (or the equivalent cash value) from any one entity when aggregated for you and your immediate family that appears to be related to the research or activities described in the grant/contract proposal.

- **Intellectual Property Rights** (e.g., patents, copyrights) from which you or your immediate family received any income over the preceding 12 months that appears to be related to the research or activities described in the grant/contract proposal.

- **Sponsored Travel** paid for, or reimbursed directly to you or your immediate family, by an organization when the organization’s business or research interests appear to be related to the research or activities described in the grant/contract proposal.

- **Paid Positions of Influence** in which you or your immediate family exercise an authoritative or direction-shaping role in an entity not affiliated with Bard College, including non-profit organizations, and the interests of the entity appear to be related to the research or activities described in the grant/contract proposal.

Outside Financial Interests that do not need to be disclosed:

- Salary, royalties, or other remuneration from Bard College or its affiliates;

- Income from seminars, lectures, or teaching engagements sponsored by public or non-profit entities, institutions of higher education, and federal, state, and local governmental agencies.

- Income from service on advisory committees or review panels for public (federal, state, and local governments) or non-profit entities.
• Any equity interest that when aggregated for you and your immediate family meets both of the following tests:
  
  ▪ Does not exceed $5,000 in value as determined through reference to public prices or other reasonable measures of fair market value, and represents more than a 5% ownership interest in any single entity; or
  
  ▪ Salary, royalties, or other payments that when aggregated for the investigator and the investigator’s immediate family over the next twelve months, are not reasonably expected to exceed $5,000.

• 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.

• Travel sponsored by an accredited U.S. institution of higher education or a government agency (federal, state, or local).
Outside Financial Interest Disclosure Form

Name:

Funding Sponsor:

- Please describe any OFIs you or your immediate family have had in the last 12 months related to Publicly/Non-Publicly Traded Entities and/or any Intellectual Property, in which you or your immediate family had interest/income/holdings exceeding $5,000 (per holding/activity, not cumulative) that appear to be related to the research or activities described in the grant/contract proposal.

- Please describe any Sponsored Travel paid for, or reimbursed directly to you or your immediate family, by any organization other than Bard College, an accredited U.S. institution of higher education, or government agency (federal, state, or local) that appears to be related to the research or activities described in the grant/contract proposal.

- Please describe the holding of any Paid Position of Influence in which you or your immediate family have any authoritative or direction-shaping role in any entity NOT affiliated with Bard College (including non-profit organizations) and the interests of the entity appear to be related to the research or activities described in the grant/contract proposal.
By signing this Form, I:

(1) Certify that I have read and understand Bard College’s Financial Conflict of Interest for Sponsored Awards Policy;

(2) Certify that the information contained in this form (including any attachments) is complete and accurate to the best of my knowledge; and

(3) Acknowledge my continuing obligation to complete and submit an updated Outside Financial Interest Disclosure Form when there is any change in my outside activities or related financial interests which meet the criteria described in the policy.

Name:

Signature:

Date: