

CONFLICT OF INTEREST DISCLOSURE RELATED TO SPONSORED PROJECTS FAQs

When must a Conflict of Interest Disclosure be filed? A Disclosure form must be filed: (1) before any proposal is submitted to the sponsor; (2) whenever there is a change in reported financial interests; and (3) upon award and annually thereafter, as long as the project is active.

Who must file? All Key Personnel are responsible for ensuring that they submit a Disclosure form as outlined above. Links will be sent to these individuals via e-mail at the time of application, the time of award and annually thereafter and all disclosures must be completed in [Kuali](#). Individuals can access their disclosure at any time via Kuali to indicate any changes.

What needs to be disclosed? The following questions are asked on the disclosure form:

- Do you, your spouse or a dependent child have an ownership interest in a business?
- Have you received \$5,000 or more for a speech, an article, a book or through consulting in the past 12 months?
- Do you receive a salary or other income in excess of \$5,000 from someone other than Marquette?
- Do you have any professional affiliations (e.g., positions or scientific appointments) at a foreign entity?
- Are you currently or planning to participate in "talents" or a similar type of program?
- Have you had any reimbursed or sponsored travel, related to your institutional responsibilities, from an outside entity (not including a U.S. federal, state or local government agency or a domestic institution of higher education) in the past 12 months?
- Do you have any in-kind resources (e.g., office/laboratory space, equipment, supplies, employees, etc.) that you are using at a foreign entity?

When is a Conflict of Interest "Related" to a sponsored project? When the work to be performed, or the results of the project, could reasonably be expected to have an impact on a financial interest. If there is any uncertainty, the relationship should be disclosed. The following are examples of such "related" financial interests:

- The entity in which you have a financial interest is likely to develop a new commercial product or service from any invention, process, or other discovery that results from the project;
- The results of the project are likely to improve manufacturing, or reduce costs or otherwise provide a commercial benefit to the entity in which you have a financial interest;
- All income from your consulting activities is considered "related" and must be disclosed if it meets the threshold dollar amount for disclosure;
- The project will subcontract part of the work, lease property, or make purchases from an entity in which you have a financial interest;
- The project will refer participants to an entity in which you have a financial interest or collaborate or participate in a consortium with an entity in which you have a financial interest.

What will happen after the Disclosure is filed? The Executive Director of the Office of Research and Sponsored Programs will review the Disclosure to determine whether a conflict of interest reasonably exists. If there is no conflict, the project can proceed without further review. If there is a potential or real conflict, options for mitigation will be discussed.

What will happen in the case of violations? Failure to file a complete, accurate Disclosure or Update, or to comply with any conditions imposed will be grounds for discipline under the Research Misconduct Policy, the University Policy on Faculty Conduct, and the Administration of Discipline and/or other applicable discipline policies. Federal sponsors may suspend or terminate an award and/or debar an investigator from receiving future awards for failure to comply with the Federal disclosure regulations on which this policy is based.