

## CONFLICT OF INTEREST IN RESEARCH

Policies and Disclosure Statement for VA Researchers  
(based on VHA Handbook 1200.13 and UW Madison Policies)

**A Conflict of Interest (COI) Disclosure Statement needs to be included with all research proposals submitted to VA for review.** A COI occurs when any financial arrangement, situation, or action affects or is *perceived* to affect the design, review, conduct, or reporting of research results. Investigators are responsible for disclosing any potential conflict of interest to the R&D Committee, documented through the use of the attached Disclosure Statement.

Anything of monetary value may potentially be considered a significant financial COI, including but not limited to:

1. Salary or other payments for services (e.g., consulting fees or honoraria);
2. Compensation to the investigator if the amount of the compensation could be affected by study outcome;
3. Equity interests (e.g., stocks, stock options or other ownership interests); and
4. Intellectual property rights (e.g., patents, copyrights/royalties from such rights).

COI disclosure statements must be updated as new COIs are identified or current ones cease to exist. If a COI is identified after approval of the protocol, that conflict must be immediately reported. COIs involving the investigator's spouse and dependent children that would reasonably appear to affect the research must also be reported.

The following items are excluded from consideration under the VA COI policy:

1. Salary, royalties, or other remuneration from VA and/or the UW Madison;
2. Income from seminars, lectures, or teaching engagements sponsored by public or nonprofit entities;
3. Income from service on advisory committees or review panels for public or nonprofit entities;
4. Financial interests, including equity, that, for the investigator and members of his/her immediate family, in total does not exceed \$10,000 in value (determined by fair market value) and does not represent more than a 5% ownership interest in any single entity; and
5. Salary, royalties, or other payments that when aggregated for the investigator and members of his/her family do not exceed \$10,000 per year.

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NOTE: Submission of the VA Conflict of Interest Disclosure Statement is not intended to supplant the responsibility of investigators to be aware of and follow any UW Madison COI policies or procedures. Information on UW COI procedures can be found at:  
<http://info.gradsch.wisc.edu/research/compliance/coi/coipolicy.html>



2. Do you or your spouse, minor child, general partner, or an organization in which you are an officer, director, trustee, or general partner own any patents that are related to the research project proposal?

Yes       No

If Yes, please provide additional information below.

Patent number: \_\_\_\_\_

Date of Patent: \_\_\_\_\_

Title of Patent: \_\_\_\_\_

3. Have any active or pending license agreements been issued?  Yes  No  
(If Yes, attach a copy of each license.)

If Yes, describe the period covered by each license and the projected royalty by year.

4. Do you or your spouse, minor child, general partner, or an organization in which you are an officer, director, trustee, or general partner own any provisional patents that are related to the research project proposal?

Yes       No

If Yes, please provide additional information below.

Patent application number: \_\_\_\_\_

Date Filed: \_\_\_\_\_

Title of Provisional Patent: \_\_\_\_\_

5. Have any active or pending license agreements been issued?  Yes  No  
(If Yes, attach a copy of each license.)

If Yes, describe the period covered by each license and the projected royalty by year.

6. Do you or your spouse, minor child, general partner, or an organization in which you are an officer, director, trustee, or general partner own or have any equity interests by way of stock ownership or stock options in a non-publicly-traded company (that may or may not own a patent) that is related to the research project proposal?

Yes  No

If Yes, what is the value of the stock/stock options?

Does this value represent more than a 5% ownership of the company?

Yes  No

7. Do you or your spouse, minor child, general partner, or an organization in which you are an officer, director, trustee, or general partner own or have any equity interests by way of stock ownership or stock options in a publicly-traded company (that may or may not own a patent) that is related to the research project proposal and is valued at more than \$10,000 (or value is projected to exceed \$10,000 in the next 12 months)?

Yes  No

If Yes, what is the value of the stock/stock options?

Does this value represent more than a 5% ownership of the company?

Yes  No

I certify that, to the best of my knowledge and belief, all of the information on this disclosure is true, correct, complete and made in good faith. I understand that false or fraudulent information on this disclosure may be grounds for not accepting the research proposal and may be punishable by fine or imprisonment (U.S. Code, Title 18, section 1001).

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(Signature of Investigator)

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(Date Signed)

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(Signature of Investigator's Supervisor)

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(Date Signed)

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(Signature of Associate Chief of Staff for Research)

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(Date Signed)

**Certification of Review by Conflict of Interest Administrator**

This VA Conflict of Interest Disclosure Statement and applicable protocol have been reviewed for compliance with applicable policies and regulations, and for a determination of the existence of a financial conflict of interest.

A financial conflict of interest: [ ] has [ ] has not been identified for this investigator on this research protocol. If a conflict of interest has been identified, the following actions are recommended:

\_\_\_\_\_  
(Signature of Acting Conflict of Interest Administrator)

\_\_\_\_\_  
(Date Signed)

**Certification of Review by Research and Development Committee**

This VA Conflict of Interest Disclosure Statement and applicable protocol have been reviewed for compliance with applicable policies and regulations, and for a determination of the existence of a financial conflict of interest.

A financial conflict of interest: [ ] has [ ] has not been identified for this investigator on this research protocol.

Recommendations:

Concur with recommendations of COI Administrator/Committee: [ ] Yes [ ] No

Any additional recommendations are addressed by letter from the R&D Committee Chair to the investigator.

\_\_\_\_\_  
(Signature of R&D Committee Chair)

\_\_\_\_\_  
(Date Signed)