GUIDE TO ANNUAL DISCLOSURE OF FINANCIAL INTEREST AND COMMITMENTS

JUNE 16, 2021
Disclosure Guide Contents (Updated 6-15-2021)

New! Researcher Disclosure System............................................................................................................. 2

Starting a New Disclosure: ............................................................................................................................ 3

  Question 1: Entities: Commitments, Financial Interests, Gifts, Management Plans, Other Support...... 3

    Add an Entity ......................................................................................................................................... 5
    Q1a Entity Commitments ...................................................................................................................... 8
    Q1b Entity Financial Interests ............................................................................................................... 8
    Q1c Entity Gifts ................................................................................................................................... 10
    Q1 Entity Research Management Plan/Outside Activity Request ...................................................... 11
    Q1 Entity Other Support ..................................................................................................................... 11

    FINISHED ADDING/ENTERING ALL ENTITIES ....................................................................................... 12

  Question 2: Campus/JPL Dual Appointment.......................................................................................... 13

  Question 3: Institutional Leader ............................................................................................................ 13

  Question 4: NEW! Biosketch and Other Support ................................................................................... 14

    Q4 Biosketch ....................................................................................................................................... 14
    Q4 Other/Current and Pending Support ............................................................................................. 14

  Question 5: PHS Travel AND CERTIFICATION SUBMISSION .......................................................... 16

    Q5 PHS/NIH Travel .............................................................................................................................. 16
    Q5 Certification ................................................................................................................................... 16

Definitions ................................................................................................................................................... 18

  Center Director ....................................................................................................................................... 18
  Commitments ......................................................................................................................................... 18
  Covered Equity Interest .......................................................................................................................... 18
  Detailed Criteria ...................................................................................................................................... 18
  Equity ...................................................................................................................................................... 18
  Financial Interests ................................................................................................................................... 18
  Foreign Talent Program .......................................................................................................................... 19
  Gifts .......................................................................................................................................................... 19
  Institutional Leader ................................................................................................................................. 20
  Institutional Responsibilities ................................................................................................................... 20
  Investigator ............................................................................................................................................. 20
  Other Support ......................................................................................................................................... 20

FAQs ............................................................................................................................................................ 21
New! Researcher Disclosure System

The Disclosure of Financial Interests and Commitments System has been redone this year, for researchers, with significant changes, to assist researchers in compliance with Federal sponsor disclosure and transparency requirements. Firefox and Chrome are both supported browsers; however, for best performance, it is recommended that you use Firefox. At this time, Safari is not supported.

When you log in this year your landing page will look something like this:
Starting a New Disclosure:

When you first log in, you will be presented with a button that says “Begin Disclosure.” Because the system is entirely new this year, you will also see a button that says “Previously Disclosed Entities (2020).” Clicking this button will present you with a list of Entities you disclosed previously (2020). The hope is that this will serve as a starting point for this year’s disclosures.

Once you begin your disclosure you will see:

Page 1: Background, policy reminders and basic instructions for this new disclosure system.

What to expect in terms of disclosure: After clicking past Page 1, you will be asked a series of five (5) questions.

Question 1: Entities: Commitments, Financial Interests, Gifts, Management Plans, Other Support

The first question, Question 1 is the “main” question. It will first ask you to consider all organizations, companies, universities or people (Entities) with whom you have a professional relationship or in which you have a financial interest:

![Disclosure](image)

It will then ask you whether you have a commitment, financial interest or receive gifts from any of these Entities that meets one of the Detailed Criteria for Commitments, Financial Interests, or Gifts:

**Detailed Criteria:**

**Commitments:**

- **CONSULTING.** Any entity or person that you have worked for as a paid or unpaid consultant.
- **ACADEMIC or RESEARCH APPOINTMENT.** Any entity where you have an academic or research appointment (upaid or paid, honorary, adjunct, visiting or otherwise)
- **SCIENCE ADVISOR/RESEARCHER.** Any foreign entity or person to which you have provided scientific advice or for which you performed research.
- **TALENT PROGRAM.** Any government or group (entity) where you have participated in a foreign talent program. A Foreign Talent Program refers to programs which include any foreign-state-sponsored attempt to acquire U.S. scientific-funded research or technology through foreign
government-run or funded recruitment programs that target scientists, engineers, academics, researchers, and entrepreneurs of all nationalities working or educated in the United States.

Distinguishing features of a Foreign Government Talent Recruitment Program include:

1. Monetary compensation provided by the foreign state to the targeted individual in exchange for the individual transferring their knowledge and expertise to the foreign country.
2. Recruitment in this context refers to the foreign-state-sponsor’s active engagement in attracting the targeted individual to join the foreign sponsored program and transfer their knowledge and expertise to the foreign state. The targeted individual may be employed and located in the U.S., or in the foreign state.
3. Many, but not all, programs aim to incentivize the targeted individual to physically relocate to the foreign state. Of particular concern are those programs that allow for continued employment at U.S. research facilities or receipt of federal research funds while concurrently receiving compensation from the foreign state.

Foreign Government Talent Recruitment Programs do not include:
1. Research agreements between the University and a foreign entity.
2. Agreements for the provision of goods or services by commercial vendors.
3. Invitations to attend or present at conferences.

• OTHER COMMITMENTS:

For Faculty: All entities when you have spent, on average, more than 13 days per academic quarter on activities for those entities outside of Caltech (excluding speaking at academic conferences or institutions or reviewing journal articles).

For Research Staff and Postdocs: Any entity outside of Caltech where you have participated in any activity(ies) related to your Institutional Responsibilities.

Financial Interests:
For purposes of Financial Interests, “Institutional Responsibilities” means an Investigator’s professional responsibilities on behalf of Caltech, and as defined by Caltech in its Conflicts of interest Policy and the Caltech Faculty Handbook. Institutional Responsibilities may include, for example, research, research consultation, teaching, professional practice, institutional committee or board memberships, service on review panels such as an Institutional Review Board or a Data and Safety Monitoring Board, and other administrative duties.

• PERSONAL REMUNERATION/EQUITY. Any entity or person that paid you and/or provided you an equity/ownership interest (Financial Interest) that is related to your Institutional Responsibilities.

• FAMILY MEMBER FINANCIAL INTEREST. Any entity in which you or an immediate family member (your spouse/domestic partner or dependent children) hold or have acquired any Financial Interests that are related to your Institutional Responsibilities.
• **PHS/NIH FUNDING + EQUITY.** Any entity in which you or an immediate family member hold any (regardless of value) equity in a non-publicly traded company must be disclosed if you have PHS/NIH Funding. If you have PHS/NIH funding founder’s shares or equity of any value, even $0, must be disclosed as it is considered a Covered Equity Interest.

• **PHS/NIH TRAVEL.** If you have PHS (e.g. NIH) funding, any entity or person that reimbursed your travel, where the aggregate financial interest from that entity or person, including remuneration and travel is valued >$4999.00. You do not need to disclose reimbursed travel from any US federal, state or local governmental agency OR any US academic institution of higher education or its affiliated medical center in the US.

**Gifts:**
For purposes of Gifts, “Institutional Responsibilities” means an Investigator’s professional responsibilities on behalf of Caltech, and as defined by Caltech in its Conflicts of interest Policy and the Caltech Faculty Handbook. Institutional Responsibilities may include, for example, research, research consultation, teaching, professional practice, institutional committee or board memberships, service on review panels such as an Institutional Review Board or a Data and Safety Monitoring Board, and other administrative duties.

• Any entity or person that provided to you or your spouse/domestic partner or dependent child any Gift, including travel services or benefits from any person or entity related to your Institutional Responsibilities.

---

**Add an Entity**

Once you have decided that you have an Entity that requires disclosure, choose “Yes.” You will need to enter all Entities meeting any of these Detailed Criteria.

**HINT:** If you previously disclosed Entities, and your relationships are still active, you should disclose all of these. (See Previously Disclosed Entities list on your Disclosure Home Page)
Choosing “Yes” to the initial Question 1 will open four (4) data entry fields:

1. Name of Entity or Person
2. Whether the Entity is Foreign, Domestic, Both, or Unknown. If you choose Foreign or Both, it will ask you for a country.
3. A field to provide a URL for the Entity (Optional)
4. And whether you have PHS/NIH Funding.

Please provide these data and “Save.”

The Entity will now appear on the LEFT MARGIN. When you are answering questions for that Entity, it will appear as BOLD and in ITALICS in LEFT MARGIN.
You can then proceed to EITHER:

- Answer Q1a about Commitments, Q1b about Financial Interests, and Q1c about Gifts OR

- Add another entity and come back to Entity 1.

If you add another Entity, it will also appear in the LEFT MARGIN.

NOTE: Both Entities have an “!” next to them, now. They are incomplete disclosures. Also, note that the middle of the page shows that you have 2 of 2 Entities that are NOT COMPLETE.

After you have entered all of your Entities, please make sure you COMPLETE them. You can navigate back by clicking on them from the LEFT MARGIN.
Completing the Disclosure:

Q1a Entity Commitments

If any of these is true, you have a Commitment that requires disclosure. Choose “Yes” and choose all that apply:

Q1b Entity Financial Interests

Q1b will now appear:

If you answer yes, you will be prompted with a series of questions, related to your financial interest and whether or not you have PHS/NIH funding. Answering the questions carefully will prompt you to disclose the information necessary pursuant to Caltech Policy and Federal Agency Sponsor requirements. FOR EXAMPLE:
**Giants: Financial Interests**

* In the past year, were you (including your spouse, domestic partner or dependent child) paid by and/or provided an equity/ownership interest in this entity? If so, is that financial interest related to your Institutional Responsibilities?  
  - Yes  
  - No

* Is the actual or estimated value of the combined financial interest received from this entity > $4,000?  
  - Yes  
  - No

* Is all or some portion of your interest an equity or ownership interest?  
  - Yes  
  - No

* Is this entity a US federal, state and local government agency OR is it a US academic institution of higher education or its affiliated medical center in the US?  
  - Yes  
  - No

* Is your ENTIRE financial interest (from this Entity or from another Entity) an honorarium received from seminars, lectures or service on advisory and review panels?  
  - Yes  
  - No

*Please indicate all Financial Interests held by or paid to you (including your spouse/domestic partner or dependent child) from this person/entity that are related to your Institutional Responsibilities.**

Check all that apply:

<table>
<thead>
<tr>
<th>Relationship</th>
<th>No</th>
<th>Yes</th>
<th>Spouse/ Domestic Partner</th>
<th>Dependent Child</th>
<th>Value (Estimated)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Founder</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Trustee</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Board</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Manager/CEO/President/TO</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Scientific Advisor, SAR</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Consultant</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Collaborator</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Speaker</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Editor</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Researcher</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Employee</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Other</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

If "Other," please provide: (a) a description of the activity, (b) whether you, your spouse/domestic partner, dependent child, or a combination of these hold the interest, and (c) the value of the interest (estimates are acceptable). If you have more than one "Other" interest, please provide this information for each.

**Total:**

* Cumulative value of Financial Interests from this entity for the past year (Include remuneration, reimbursed travel (PMH only), gifts, and equity (you may estimate equity).  

<table>
<thead>
<tr>
<th>Value (Estimated)</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
</tr>
</tbody>
</table>

Job or Appointment Title (if any)

**Total:**

* What is the amount of time allocated/committed to external activities for this entity?  

<table>
<thead>
<tr>
<th>Total</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
</tr>
</tbody>
</table>
When you are finished with Q1b, Financial Interest, you will be prompted to answer Q1c, Gifts.

**Q1c Entity Gifts**

Again, if you answer “Yes” additional questions will be asked: For Example:
Q1 Entity Research Management Plan/Outside Activity Request

If appropriate, you will be asked if you have a Research Management Plan (Faculty) or an approved Outside Approval Request Form on file. Please attach (Research Management Plan) by uploading a current copy. Please associate your OA, if applicable.

Q1 Entity Other Support

NEW! You will be asked if you received anything that could be considered “Other Support” from this Entity. This information will be available to you in Question 4, later.

Other Support includes all resources (financial and in-kind) made available to a researcher in support of and/or related to all of their research endeavors, regardless of whether or not they have monetary value and regardless of whether they are used for research at Caltech or elsewhere.

Other Support NIH: https://grants.nih.gov/grants/forms/othersupport.htm

SAVE! When Entity is COMPLETE, the “!” goes away and the “counter” shows only 1 of 2 Entities
Incomplete:

Complete all Entities, before moving on to the Next Question. Make sure that all “!” are gone from the
LEFT MARGIN. Note, you will receive “Error” Messages if your Disclosure for any Entity is incomplete.
FOR EXAMPLE:

You can also identify these “errors” by clicking on the “View Missing Fields” button.

FINISHED ADDING/ENTERING ALL ENTITIES

When all entered Entities are complete, there are no further “!” in the LEFT MARGIN. You can advance
to the Next Question. You will be prompted one last time to disclose any further Entities before moving
to Q2. NOTE: You can add another Entity at ANY TIME by navigating back to Question 1 or by clicking
the “Add Entity” button at the top. Please make sure all Entities are COMPLETE and you have added all
Entities before “Certifying and Submitting.” You won’t be able to add Entities after submission until
your Reviewer sees your Disclosure and either completes review or returns it to you.
**Question 2: Campus/JPL Dual Appointment**

Identify dual appointments and related funding, if any.

<table>
<thead>
<tr>
<th>Question</th>
<th>Details</th>
</tr>
</thead>
<tbody>
<tr>
<td>Do you have a dual appointment on Campus and at JPL?</td>
<td>YES / NO</td>
</tr>
<tr>
<td>Title on Campus</td>
<td>Instructor of Engineering</td>
</tr>
<tr>
<td>Title at JPL</td>
<td>Member of Technical Staff</td>
</tr>
<tr>
<td>Primary Appointment</td>
<td>JPL / Campus</td>
</tr>
<tr>
<td>Describe what you do at your secondary appointment</td>
<td></td>
</tr>
<tr>
<td>Pending</td>
<td></td>
</tr>
</tbody>
</table>

**Question 3: Institutional Leader**

Identify whether or not you are an Institutional Leader. An Institutional Leader is the President, Vice President, Provost, Vice Provost, Division Chair or **Center Director** (the named Director of a recognized Caltech Center or Institute with an annual operating budget of $1M or more). This question will be further developed next year to help identify Institutional Conflicts of Interest.

<table>
<thead>
<tr>
<th>Question</th>
<th>Details</th>
</tr>
</thead>
<tbody>
<tr>
<td>Are you an Institutional Leader (President, Vice President, Division Chair or Center Director)?</td>
<td>YES / NO</td>
</tr>
</tbody>
</table>
Question 4: NEW! Biosketch and Other Support
This section extracts information from your disclosure and creates a report you can share with an administrator of your choice who can use the information for “Biosketch” or “Other/Current and Pending Support” disclosures to federal sponsors.

First, specify a delegate who can “see” this information. You do not need to specify someone if you do not wish to do so.

Q4 Biosketch
Next, review at your Biosketch information. Are there Entities missing? If yes, please add the other Entities:

Q4 Other/Current and Pending Support
Finally, review your Other Support.
Remember Other Support includes all resources (financial and in-kind) made available to a researcher in support of and/or related to all of their research endeavors, regardless of whether or not they have monetary value and regardless of whether they are used for research at Caltech or elsewhere.

Other Support NIH: https://grants.nih.gov/grants/forms/othersupport.htm

Current and Pending Support NSF: https://www.nsf.gov/pubs/policydocs/pappg20_1/pappg_2.jsp#IIC2h

You can add Other Support that is not related to your outside activities/financial interests.

Eventually, we hope to collect all of your Caltech grants, gifts, and support staff (postdoc/graduate student/visitor) funding here.
Question 5: PHS Travel AND CERTIFICATION SUBMISSION

Q5 PHS/NIH Travel
If you have PHS/NIH Funding, please make sure you disclose all relevant travel, not previously disclosed during the year by clicking the “Add Travel” button.

If you do not have PHS/NIH Funding Select “No”

Q5 Certification
Please review all relevant Caltech Policies and have carefully read the certification. Ensure that you have added all the Entities you need to add (for now) and have answered all of the questions, Questions 1-5. Check the certification and “Submit.”
Disclosure

Is any of your research funded by NIH (e.g., R01) and do you meet the definition of Investigator under the Caltech Policy and Procedures for Managing Conflict of Interest Requirements Imposed by Federal Sponsor?

Yes No

Please remember to receive travel outside of the United States for Export Control Concerns prior to travel:

https://research.caltech.edu/exportcontrol/exporttravel

Add Travel

CERTIFICATION

Before submitting, you must signify your understanding of the Caltech Conflict of Interest Policy and the Policy and Procedures for Managing Conflict of Interest Requirements Imposed by Federal Sponsor and certify to the accuracy of your disclosure by checking the box below.

[ ] Check box required

I have read and agree to abide by Caltech’s Conflict of Interest Policy and the Policy and Procedures for Managing Conflict of Interest Requirements Imposed by Federal Sponsor. In submitting this form, I certify that the information provided is true, complete and accurate, to the best of my knowledge. I supply this information for confidential review by Caltech and understand any further disclosure will be limited to those necessary to meet Caltech’s legal/mines, legal/ and/or contractual requirements. I understand and agree that if, subsequent to submitting this disclosure, situations arise that raise questions of conflict of commitment or interest, I will promptly disclose them in accordance with Caltech’s Conflict of Interest Policy.

Note: Submissions of this disclosure do not satisfy or relieve Campus or JPL staff who engage in outside business activities from compliance with the Institute Conflict of Interest Outside Activity requirements.
Definitions

Center Director
A Center Director is the named Director of a recognized Caltech Center or Institute with an annual operating budget of $1M or more.

Commitments
Any of the following, should be disclosed as Commitments:

- CONSULTING. Any entity or person that you have worked for as a paid or unpaid consultant.
- ACADEMIC or RESEARCH APPOINTMENT. Any entity where you have an academic or research appointment (unpaid or paid, honorary, adjunct, visiting or otherwise)
- SCIENCE ADVISOR/RESEARCHER. Any foreign entity or person to which you have provided scientific advice or for which you performed research.
- FOREIGN TALENT PROGRAM. Any government or group (entity) where you have participated in a Foreign Talent Program.
- OTHER COMMITMENTS: For Faculty: All entities when you have spent, on average, more than 13 days per academic quarter on activities for those entities outside of Caltech (excluding speaking at academic conferences or institutions or reviewing journal articles). For Research Staff and Postdocs: Any entity outside of Caltech where you have participated in any activity(ies) related to your Institutional Responsibilities.

Covered Equity Interest
A Covered Equity Interest is equity in a publicly traded entity where the value is >$4999. With regard to any non-publicly traded entity, any Equity is considered a Covered Equity Interest. A Covered Equity Interest does not include income from investment vehicles, such as mutual funds and retirement accounts, as long as the researcher does not directly control the investment decisions made in these vehicles.

Detailed Criteria
Detailed Criteria include Commitments, Financial Interests and Gifts related to your Institutional Responsibilities for Caltech.

Equity
Equity is limited to Covered Equity Interests which include equity (stock, stock options or other ownership interest) received from a publicly or non-publicly traded company.

Financial Interests
Financial Interests include all compensation >$4999 and Covered Equity Interests from all activities, including, but not limited to consulting, teaching engagements, seminars, lectures, and service on advisory committees or review panels. Any of the following should be disclosed as Financial Interests:
• PERSONAL REMUNERATION/EQUITY. Any entity or person that paid you and/or provided you an equity/ownership interest (Financial Interest) that is related to your Institutional Responsibilities.

• FAMILY MEMBER FINANCIAL INTEREST. Any entity in which you or an immediate family member (your spouse/domestic partner or dependent children) hold or have acquired any Financial Interests that are related to your Institutional Responsibilities.

• PHS/NIH FUNDING + EQUITY. Any entity in which you or an immediate family member hold any (regardless of value) equity in a non-publicly traded company must be disclosed if you have PHS/NIH Funding. If you have PHS/NIH funding founder’s shares or equity of any value, even $0, must be disclosed as it is considered a Covered Equity Interest.

• PHS/NIH TRAVEL. If you have PHS (e.g. NIH) funding, any entity or person that reimbursed your travel, where the aggregate financial interest from that entity or person, including remuneration and travel is valued >$4999.00. You do not need to disclose reimbursed travel from any US federal, state or local governmental agency OR any US academic institution of higher education or its affiliated medical center in the US.

Foreign Talent Program
A Foreign Talent Program refers to a program which include any foreign-state-sponsored attempt to acquire U.S. scientific-funded research or technology through foreign government-run or funded recruitment programs that target scientists, engineers, academics, researchers, and entrepreneurs of all nationalities working or educated in the United States.

Distinguishing features of a Foreign Government Talent Recruitment Program include:

1. Monetary compensation provided by the foreign state to the targeted individual in exchange for the individual transferring their knowledge and expertise to the foreign country.

2. Recruitment in this context refers to the foreign-state-sponsor’s active engagement in attracting the targeted individual to join the foreign sponsored program and transfer their knowledge and expertise to the foreign state. The targeted individual may be employed and located in the U.S., or in the foreign state.

3. Many, but not all, programs aim to incentivize the targeted individual to physically relocate to the foreign state. Of particular concern are those programs that allow for continued employment at U.S. research facilities or receipt of federal research funds while concurrently receiving compensation from the foreign state.

Foreign Government Talent Recruitment Programs do not include:

1. Research agreements between the University and a foreign entity.

2. Agreements for the provision of goods or services by commercial vendors.

3. Invitations to attend or present at conferences.

Gifts
Gifts include any gratuity, favor, discount, entertainment, hospitality, loan, forbearance, license, special access, equipment time, samples, research data, or other item having monetary value. A gift also includes services as well as gifts of training, transportation, local travel, lodging, meals, research hours,
whether provided in-kind, by purchase of a ticket, payment in advance, or reimbursement after the expense has occurred. For purposes of this disclosure, you do not need to disclose unsolicited gifts of textbook.

Disclose all Gifts received by you or your spouse/domestic partner or dependent child from any person or entity related to your Institutional Responsibilities.

Institutional Leader
An Institutional Leader includes the President, Vice President, Provost, Vice Provost Division Chair or Center Director. Transactions commonly handled by an Institutional Leader on behalf of Caltech include, but are not limited to:

- Solicitation/negotiation for research funds or gifts
- Negotiation of intellectual property
- Procurement of goods or services
- Negotiation for the use of Institute facilities

Institutional Responsibilities
Institutional Responsibilities means an Investigator's professional responsibilities on behalf of Caltech, and as defined by Caltech in its Conflicts of interest Policy and the Caltech Faculty Handbook. Institutional Responsibilities may include, for example, research, research consultation, teaching, professional practice, institutional committee or board memberships, service on review panels such as an Institutional Review Board or a Data and Safety Monitoring Board, and other administrative duties.

Investigator
An Investigator is the project director or principal investigator, co-investigators, and any other person, regardless of title or position, who is responsible for the design, conduct or reporting of the research funded by NSF or PHS, or proposed for such funding, which may include faculty, JPL staff, Caltech staff, post-doctoral scholars, students, external collaborators and co-investigators from other institutions or organizations.

Other Support
Other Support includes all resources (financial and in-kind) made available to a researcher in support of and/or related to all of their research endeavors, regardless of whether or not they have monetary value and regardless of whether they are used for research at Caltech or elsewhere.

Other Support NIH: https://grants.nih.gov/grants/forms/othersupport.htm

Current and Pending Support NSF: https://www.nsf.gov/pubs/policydocs/pappg20_1/pappg_2.jsp#IIC2h
FAQs

General

1. How do I submit a Caltech Financial Interest and Commitment Disclosure?

   ANSWER:

   Log in to the Access.Caltech web page: http://access.caltech.edu (Please note that a Virtual Private Network (VPN) connection is required for off-campus access.)

   Enter your Username and Password (this is the same as your IMSS/Kronos login credentials) and click the OK button.

   Select "Disclosure of Financial Interests and Commitments" under Administrative Services, and complete the form.

2. I am having technical difficulties with the system. What should I do?

   ANSWER: First, please make sure you are using either Firefox (preferred browser) or Google Chrome. Unfortunately, at this time, Safari is not supported. If your technical problem is not related to your browser, please contact IMSS at 626-395-3500.

3. I am a Professor Emeritus. I no longer have research funding, conduct research or perform academic services for Caltech. Do I need to complete a Financial Interest and Commitment Disclosure?

   ANSWER: No. As long as you are not conducting research or teaching for Caltech, you do not have to complete a disclosure. Please contact your Division DOO and have them request an exemption on your behalf.

4. I am a Visiting Scientist, Visitor, Guest, Visiting scholar or postdoc, or Occasional Employee. I am working in a research lab. Do I need to complete a Financial Interest and Commitment Disclosure?

   ANSWER: Yes. Anyone conducting research, in any capacity, should complete a disclosure.

5. I am an External Affiliate at campus. I am working in a research lab. Do I need to complete a Financial Interest and Commitment Disclosure?

   ANSWER: Maybe. It depends upon your agreement with Caltech, whether or not your home institution has a federally compliant COI policy, and the funding in the research lab at Caltech you will be working in. Please check with the Office of Research Compliance if you are unsure (orc@caltech.edu).

6. I am a campus employee and have an appointment at JPL. Do I need to disclose at JPL as well as on campus, using the Financial Interest and Commitment Disclosure?
ANSWER: No. You should only complete one disclosure, either at campus or at JPL. If your primary appointment is at campus, please complete the campus disclosure. If your primary appointment is at JPL, complete the JPL disclosure.

7. I forgot to complete my answer to Question 2. I haven’t yet certified and submitted my answer. Can I go back to Question 2?

ANSWER: You can navigate from question to question using the “Question X” buttons across the top, as long as you have not submitted your disclosure.

Question 1: Disclosure of Commitments, Financial Interests and Gifts from Entities

8. I assume previously disclosed entities will appear when one has to update the forms every year or more frequently? Will the app require refilling these in from a list or provide the user with a list that auto-fills for Question 1?

ANSWER: This year (2021), previous disclosures will not repopulate. A list of your previously disclosed entities is available on your Disclosure “Home Page” (see picture).

9. How far back do I need to report Commitments, Financial Interests or Gifts?

ANSWER: The disclosure period is for 1 year prior. You should disclose all commitments, financial interests or gifts received since June 1, 2020. You need not disclose any of these things that happened prior to June 1, 2020 as these should have been reported during last year’s disclosure cycle. If you did not disclose something during last year’s disclosure cycle that should have been disclosed, please contact the Office of Research Compliance (orc@caltech.edu) for guidance.
10. How do I tell whether or not my disclosure for an Entity is complete or not?
   ANSWER: The Entities appear on the left side-margin as you add them. If they are incomplete they show with a “!” in a circle. When complete, the “!” disappears.

Question 1a: Commitments

11. What commitments should I disclose?

   ANSWER: By answering the questions presented to you after entering a particular entity, you will be prompted to disclose the commitment you are required to disclose. Generally, any of the following, should be disclosed as commitments:
   - CONSULTING. Any entity or person that you have worked for as a paid or unpaid consultant.
   - ACADEMIC or RESEARCH APPOINTMENT. Any entity where you have an academic or research appointment (upaid or paid, honorary, adjunct, visiting or otherwise)
   - SCIENCE ADVISOR/RESEARCHER. Any foreign entity or person to which you have provided scientific advice or for which you performed research.
   - FOREIGN TALENT PROGRAM. Any government or group (entity) where you have participated in a Foreign Talent Program.
   - OTHER COMMITMENTS:
     o For Faculty: All entities when you have spent, on average, more than 13 days per academic quarter on activities for those entities outside of Caltech (excluding speaking at academic conferences or institutions or reviewing journal articles).
     o For Research Staff and Postdocs: Any entity outside of Caltech where you have participated in any activity(ies) related to your Institutional Responsibilities.

12. I am a Visiting Associate. Do I need to disclose my home institution as a commitment, or is it understood that I have this commitment?

   ANSWER: All visitors (Visitors, Visiting Associates, Visiting Professors, or Guests) performing or collaborating on research while at Caltech should disclose their affiliation with their home institution (if one exists). It is unlikely that this will be determined to be a conflict of commitment or interest, but disclosure is required.

13. The question concerns the "Commitments" subsection of the "Detailed Criteria" section and, specifically, the commitment to:
   "Any foreign entity or person to which you have provided scientific advice or for which you performed research."
   Should research collaborators outside Caltech, both junior and senior (students, postdocs and faculty), be included in this disclosure? Please note that reporting every single instance of such cases would be rather time-consuming, and perhaps even impossible.

   ANSWER: (1) Performing Research: You must provide the names of entities or persons for which you performed any research, whether or not you were reimbursed for that research. (2) Providing Scientific Advice: You should provide the names of entities or persons with whom you have had significant scientific interaction or exchange that also required a “commitment” of your time in the past year. Participation on a national science advisory board for any country must be included in your disclosure. General conversation at a conference or a one time phone
or zoom conversation is not significant. Conversations and exchanges leading to a publication are likely to be significant and require time commitment. For some general guidance around collaboration, please see

14. Do I need to disclose service on an NSF proposal review panels?

ANSWER: Generally, you do not need to disclose time spent on NSF (US Government) proposal review panels as this is considered part of your normal academic activities. However, if you spend more than 13 days per quarter on this type of review activity, even if it is for the US Government, you should discuss the activity with your Division Chair. If you have a permanent appointment/position at NSF (e.g. you are on detail, serve on the NSB, or the like) or you spend any time on a foreign government proposal review panel, you must disclose this.

Question 1b: Financial Interests

15. What financial interests should I disclose?

ANSWER: By answering the questions presented to you after entering a particular entity, you will be prompted to disclose the financial interests you are required to disclose. Generally, any of the following, should be disclosed as financial interest:

Financial Interests include all compensation >$4999 and Covered Equity Interests from all activities, including, but not limited to consulting, teaching engagements, seminars, lectures, and service on advisory committees or review panels.

Any of the following should be disclosed as Financial Interests:

- PERSONAL REMUNERATION/EQUITY. Any entity or person that paid you and/or provided you an equity/ownership interest (Financial Interest) that is related to your Institutional Responsibilities.
- FAMILY MEMBER FINANCIAL INTEREST. Any entity in which you or an immediate family member (your spouse/domestic partner or dependent children) hold or have acquired any Financial Interests that are related to your Institutional Responsibilities.
- PHS/NIH FUNDING + EQUITY. Any entity in which you or an immediate family member hold any (regardless of value) equity in a non-publicly traded company must be disclosed if you have PHS/NIH Funding. If you have PHS/NIH funding founder’s shares or equity of any value, even $0, must be disclosed as it is considered a Covered Equity Interest.
- PHS/NIH TRAVEL. If you have PHS (e.g. NIH) funding, any entity or person that reimbursed your travel, where the aggregate financial interest from that entity or person, including remuneration and travel is valued >$4999.00. You do not need to disclose reimbursed travel from any US federal, state or local governmental agency OR any US academic institution of higher education or its affiliated medical center in the US.
16. Do I need to disclose my NSF, NIH, or other Federal Agency awards?

ANSWER: You do not need to disclose any awards, contracts or gifts that are made to Caltech in your personal financial interest disclosure. If you have received, personally, any funds from awards, consulting fees, contracts or gifts that are used for research, you must disclose these.

17. I am a paid consultant or visiting scholar for Company A and my lab receives funds from Company A in either the form of sponsored research or via a gift to Caltech that sponsors my postdoc. Do I need to report my consulting or scholar activity?

ANSWER: Yes, include Company A as an entity in your disclosure. Make sure you disclose that Company A sponsors your research or directly or indirectly sponsors lab personnel, and that your relationship with Company A is related to your Institute Responsibilities and research funding.

18. I have $5000 worth of stock in Company A. My lab receives funds from Company A in either the form of sponsored research or via a gift to Caltech that sponsors my postdoc. Do I need to report my investment interest?

ANSWER: Yes, include Company A as an entity in your disclosure. As you have direct control over your investment in Company A and Company A sponsors your research or directly or indirectly sponsors lab personnel (through a gift), and this investment is related to your Institute Responsibilities and research funding, you will be prompted to disclose these relationships.

19. I have $5000 worth of stock in Company A. I believe Company A might sponsor research at Caltech, but I do not receive any of these funds. Do I need to report this investment?

ANSWER: Maybe. Include Company A as an entity in your disclosure. Based upon your answers, the system may prompt you to disclose information regarding Company A. Because you have direct control over your investment in Company A, and may be responsible for some aspect of Caltech’s relationship with Company A, such as licensed technology from your lab, or negotiating an agreement with Company A for research sponsorship at Caltech, this would be related to your Institute Responsibilities and should be disclosed. If in doubt, err on the side of caution and disclose or call for help.

20. I have $500,000 worth of stock in my retirement fund. I do not control the individual investments, but I know that part of my portfolio includes stock in Company A. My lab receives funds from Company A in either the form of sponsored research or via a gift to Caltech that sponsors my postdoc. Do I need to report my consulting investment interest?

ANSWER: No. You do not have direct control over your investment in Company A. This is not a Covered Equity Interest. However, if you have other relationships, commitments or gifts from Company A, you can enter it as an Entity into the system to confirm that there is no required disclosure.
Question 1c: Gifts
Questions Coming Soon.

Other Support
Questions Coming Soon.

Travel for NIH/PHS Awardees
Questions Coming Soon.

Question 2: JPL/Caltech Appointment
21. I am Caltech Faculty and have an appointment at JPL. Do I need to disclose at JPL as well as on campus, using the Financial Interest and Commitment Disclosure?

ANSWER: No. You should only complete one disclosure, either at campus or at JPL. If your primary appointment is at campus, please complete the campus disclosure. If your primary appointment is at JPL, complete the JPL disclosure. If you have a dual appointment, though, you should answer this question 2, YES. You will then be prompted to provide your title at JPL and how your salary is covered.

Question 3: Institutional Leader
22. What is the question about “Institutional Leader” about?
ANSWER: This question is to identify whether or not you are an Institutional Leader. An Institutional Leader is the President, Vice President, Provost, Vice Provost, Division Chair or Center Director (the named Director of a recognized Caltech Center or Institute with an annual operating budget of $1M or more). This question will be further developed next year to help identify Institutional Conflicts of Interest.

Question 4: Biosketch and Other/Current and Pending Support
23. What is this question about?
ANSWER: This question extracts information from your disclosure and creates a report you can share with an administrator of your choice who can use the information for “Biosketch” or “Other/Current and Pending Support” disclosures to federal sponsors.

24. Who should I delegate?
ANSWER: Someone who can access the information shown in Question 4. The plan is to have this page available outside of the disclosure system, so it can be used for to help complete Federal Agency disclosure requirements for Biosketch and Other/Current and Pending Support, as necessary.

25. What are the start and end dates for their access to the information?
ANSWER: This is the timeframe the individual will have access. It is probably a good idea to grant access for a year and re-authorize next year.
Question 5: Travel for NIH/PHS Awardees
Questions Coming Soon.

Question 5: Certification/Submission

26. I submitted my disclosure and then realized that I forgot to enter an Entity. What should I do?

ANSWER: Once submitted, the disclosure needs to be reviewed by the pre-reviewer/reviewer or returned by them to the discloser. This keeps the workflow moving correctly. This is why there are several reminders to make sure you have added all your entities before submitting.