

CONFLICT OF INTEREST and
COMMITTMENT:
Faculty Handbook



JOHNS HOPKINS
BLOOMBERG SCHOOL
of PUBLIC HEALTH

Office of Academic Affairs

HANDBOOK ON REPORTING CONFLICT OF INTEREST AND COMMITMENT

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Overview

University policies require that faculty report external activities, including those activities that potentially pose a conflict of interest and/or a conflict of commitment. **Conflicts of Interest** occur when a faculty member's institutional responsibilities could be compromised by his or her external activities. For example, a common conflict of interest arises when a faculty member conducts research that is sponsored by, or involves a product of, an entity with which the faculty member has an external relationship. **Conflicts of Commitment** occur when faculty members' time and attention devoted to external activities interferes with their ability to fulfill their obligations to the School. The existence of a potential conflict does not indicate that the activity is prohibited; most conflicts can be managed to protect both you and the School. The School has a standing committee that reviews and manages conflicts.

This handbook provides guidance on the types of external activities JHSPH faculty commonly engage in, and the disclosure requirements and procedures for those activities.

Guidelines for External Agreements

Conflicts of Interest may take many forms, but generally occur when a faculty member's institutional responsibilities could be compromised by his or her external agreements. External activities include consulting, serving on a board of directors/scientific advisory board, or holding a paid position with an external entity. Activities to develop and translate new basic research into clinical and public health applications often involve complex collaborations between government agencies, research institutions, and the private sector that fall outside the typical sponsored research arrangement. The Policy on Interaction with Industry (PPM-10) covers circumstances separate from the types of industry-associated activities that are contractual arrangements with the School and processed through the Office of Research Administration, and is directed at interactions with industry that faculty members engage in on their own. These external activities usually require investigators to sign a private agreement or contract.

The School does not review these private agreements. Investigators are responsible for ensuring that private agreements are in compliance with all University policies, including the PPMs related to outside activities, PPM-4 and PPM-10. We recommend you contact your personal attorney to ensure that your interests are protected. However, below are some general guidelines to follow when entering into private agreements:

- Outside agreements should not interfere with your institutional responsibilities at the University.
- Private agreements should be entered into by you as an individual and the company; you are not allowed to enter into private agreements as a representative of the University.

- JHU and JHSPH are not a party to private agreements and will, therefore, have no liability under them. Consequently, JHU/JHSPH, or a representative thereof, will not sign any private agreements. You cannot use any JHU/JHSPH facilities, resources or funds in the fulfillment of your responsibilities under the agreement.
- You are not allowed to engage any JHU or JHSPH employees, including students, trainees, and postdoctoral fellows to provide services under the Agreement.
- The outside entity is not allowed to use the name of JHU/JHSPH in any documents or marketing materials.
- You should not disclose, or be asked to disclose, any confidential information that is proprietary to JHU/JHSPH, including providing early or exclusive access to JHU/JHSPH research or disclosing inventions.
- You should make sure that the outside entity will only have rights to any intellectual property that is developed by you alone or in collaboration with others as a sole and direct result of the performance of services under this Agreement. The entity shall have no rights under the Agreement to any intellectual property that is developed as a result of a program financed in whole or in part by funds provided by or under the control of JHU/JHSPH.
- Do not participate in any activity that could constitute endorsement, promotion, or marketing of any product, technology or service.
- Your role should be limited to providing expert advice. You should not participate in, direct or conduct research for or on behalf of an outside entity.
- You should disclose your relationship to the outside entity in all publications and presentations of research supported by the outside entity. Disclosure is especially important in journal articles.
- If you want to make sure that your agreement is in compliance with JHU/JHSPH policies, you can ask the outside entity to add "The Johns Hopkins University School of Public Health Uniform Provisions" to the agreement. (See Appendix).

Conflict of Commitment Reporting

Faculty are responsible for seeking advice from their Chair prior to engaging in any activities that could conflict with their time devoted to research, teaching, and service responsibilities to the School. PPM-4 does not limit the number of days a faculty member can spend on external activities. The time a faculty member is allowed to spend on outside activities is determined by individual discussion between a faculty member and his or her Department Chair. Faculty members must notify their Chair prior to making any commitments that could conflict with their obligations to the School. In addition, if a faculty member reports external activities totaling 24 days or more or external teaching activities totaling more than 5 days, this information is provided to the Department Chairs for their consideration.

Conflict of Interest Training

In accordance with federal regulation, all faculty are required to receive training related to conflict of interest whenever the institution's policy changes and every four years thereafter. The JHU course can be accessed here: <http://lms4.learnshare.com/l.aspx?CID=89&A=2&T=412863> or through the faculty portal. Log in to the MyLearning system using your JHED ID and password.

The course can be accessed at the "Take Course" link. If the module does not come up in a separate window, check to make sure the internet browser's pop-up blockers are switched off, or try holding down the control key while clicking the "Take Course" button. The training module will pop up in a separate screen.

After completing the training, close the course pop-up window. Then, select "My Learning History" from the menu on the far left side of the screen. The COI course will be included in your list of completed courses and certificates. Scroll over to the right side of the screen to the "Certificate" column and click "View PDF" to print/save the PDF of the completion certificate. Retain this, which includes the date of training, for your records.

Conflict of Interest Reporting

The University's online reporting system is called [eDisclose \(http://edisclose.jhu.edu\)](http://edisclose.jhu.edu) and can also be accessed through the faculty portal. Reporting of external activities is based both on transactional disclosures of external activities as they happen or are about to happen, plus an annual certification that your external activities are up to date. It is essential that disclosures be made in a timely manner, typically within 30 days. Late disclosures may lead to serious consequences if a financial conflict of interest is detected. The Conflict of Interest staff reviews each disclosure, determines whether a potential conflict exists and if review by the Conflict of Interest Committee is required. The committee then develops an appropriate management plan to mitigate the conflict and notifies the faculty member of the plan.

To submit a new disclosure in eDisclose, log in at the link above using your JHED ID and password. On the "My Disclosures" home page, select the "Create Disclosure" button on the left. Answer questions pertaining to your activity using the smart form. If you have questions about using the system, select the [eDisclose Help Desk](#) button in the black tool bar at the top of the screen. It contains user guides to help you become acquainted with the eDisclose system. When you are done with your disclosure, make sure you click the green **Submit** button on the "Disclosure Workspace" page in order to finish the process.

Details about the types of external activities you need to disclose are provided in the Appendix under the following titles: When Do I Have to Disclose, COI Comparison Chart, and Travel Expense Reporting Flowchart and Worksheet. You should provide a disclosure prior to undertaking an outside commitment or when a disclosed interest or activity changes (*e.g.*, the amount or type of remuneration, type of service, or time commitment). When an activity changes, or you have a new activity for the same outside interest or entity, select the "Edit Disclosure" button on the left and add the change or new

activity to the existing entry. That is, if you provide both consulting and service on a DSMB for the same company, both should be disclosed under the single disclosure for that company.

Each year, full-time faculty and salaried part-time faculty will be asked via email to certify that their eDisclose information is up to date. The Annual Certification does not affect the obligation to disclose outside activities and interests as they arise and before proposing related research.

Familial Conflicts

Familial relationships may also give rise to potential conflicts of interest. A familial conflict can occur when a faculty member hires a spouse, domestic partner, child, or other relative to work on his or her projects. A familial conflict can also occur when the faculty member's spouse, domestic partner, child, or other relative has a financial interest related to the faculty member's research or institutional responsibilities. Such arrangements must be reported. Faculty members are prohibited from supervising relatives or determining salary or remuneration for relatives.

Tech Transfer Activities

Conflicts of interest can arise in tech transfer when a faculty member is conducting research involving a product for which the faculty member is a licensed inventor. Faculty should report conflicts arising out of tech transfer activities at the time the research activities are proposed and provide relevant updates in eDisclose as they arise.

Conflicts of Interest in Human Subjects Research

Conflicts of interest in human subjects research deserve special scrutiny because of the potential for such conflicts to affect the rights and welfare of human subjects. Faculty conducting human subjects research must indicate a potential conflict of interest on the IRB application and must report this through eDisclose. The COI Committee will review the report and make management recommendations to the IRB and the PI. A common management condition includes disclosure of the arrangement in the in the consent form.

The IRB can decide whether to a) accept the Conflict of Interest Committee recommendations, b) accept the recommendations with additional management measures prescribed by the IRB, or c) conclude that the human subjects research cannot proceed.

NIH Conflict of Interest Reporting requirements

In accordance with 42 CFR 50 Subpart F, the School must report to NIH those conflicts that are determined to be financial conflicts of interest (FCOI) related to Public Health Service (PHS) funded research. An outside interest becomes a reportable FCOI if the faculty member is entitled to receive more than \$5,000 in remuneration from a publicly traded entity, including but not limited to salary, honoraria, and equity interest. The value of equity is determined by fair market value on the date of disclosure. Regarding a non-publicly traded entity, an outside interest becomes a reportable FCOI if the faculty member is entitled to receive more than \$5,000 in remuneration and/or **any** equity interest. Intellectual property rights are also considered a reportable FCOI.

If the COI committee determines that a financial interest could directly and significantly affect the design, conduct or reporting of PHS supported research, the School will report this FCOI to the NIH. However, this does NOT mean that the research cannot be done but, instead, that a management plan for avoiding biased research must be in place. Federal regulations also require that the school respond to requests from any member of the public for information regarding FCOIs reported to NIH that are associated with PHS-funded research.

Grant and contract submission requires disclosure of potential conflicts related to the research to the Office of Research Administration (ORA) and in eDisclose. The Conflict of Interest Committee considers these disclosures for review and management.

What constitutes a Conflict of Interest?

The questions posed below, when answered “yes”, are examples of potential conflicts of interest:

- Does your external activity involve the uncompensated use of facilities or resources belonging to Johns Hopkins University by or on behalf of another organization?
- Does your external activity involve the transfer of your intellectual or tangible property rights including patent ownership or licensing to an organization other than the University?
- Does your external arrangement or agreement restrict the public disclosure of the existence of the external arrangement?
- Does the external activity restrict your right to publicly disclose information developed by you through your involvement in the activity?
- Does your involvement in the external activity appear to influence either the conduct of the University’s business or the conduct of research within the University?
- Is your research and/or academic work sponsored by a company for which you consult or have a paid position?
- Is your research and/or academic work sponsored by a company for which you (or your spouse or your children) hold any ownership interest (stock, not including stock owned through a mutual fund) or from which you are entitled to receive royalties from a licensing agreement?
- Is your research and/or academic work sponsored by a company for which you serve on its scientific advisory board or board of directors?
- Are you (or your spouse or child) in a position to influence University decision making regarding purchasing products or services from an organization that you (1) hold an equity interest (not mutual funds) in the organization, (2) hold a position in the organization or on its governing board, and/or (3) serve as a paid or unpaid consultant to the organization?
- Is your spouse/child involved in one of your sponsored projects, either directly or through a

subcontract?

- Does your external activity involve use of the name of the Johns Hopkins University or any of its schools or divisions by another organization?

This list is not exhaustive. There may be other instances when an external activity could pose a potential conflict and would need to be reported. Contact our office for guidance if you are unsure if an activity needs to be reported.

Conflict of Interest Committee Review and Management

The Conflict of Interest Committee reviews all reports of outside activities to determine whether a potential conflict of interest exists. If the Committee finds a potential conflict exists, the Committee informs the faculty member in writing of required conditions to manage the conflict. Common management conditions required by the Committee could include:

- Disclose relationship with external entity in relevant publications and presentations
- Limit of a faculty member's role in the research study (eg. Exclusion from consenting participants, data analysis, etc)
- Appoint an independent oversight committee for the study
- Require that the PI places equity in escrow account
- Transfer supervision of a spouse to another individual

If the Committee finds that the conflict cannot be managed, the Committee can prohibit the proposed external activity.

Changes in previously disclosed relationships with outside entities may require that the Conflict of Interest Committee re-review both the disclosure and any conditions in place to manage the conflict. For example, a consulting relationship with a company disclosed in eDisclose could pose a conflict if the faculty member subsequently receives a grant from the company to do research. In these situations, faculty should provide information about this additional relationship to the company in eDisclose.

Committee membership can be viewed here:

<https://my.jhsph.edu/Committees/ConflictofInterestCommittee/Pages/default.aspx>

Contact Information for Assistance

For questions about conflict of interest and commitment, please contact Miye Schakne, Research Compliance Officer, at 410-502-0433 or mschakne@jhu.edu

Resources:

JHSPH Conflict of Interest and Commitment Policy (PPM-4)

https://my.jhsph.edu/Resources/PoliciesProcedures/ppm/PolicyProcedureMemoranda/Faculty_04_Conflict_of_Interest_and_Commitment.pdf

JHSPH Policy on Interaction with Industry (PPM-10)

https://my.jhsph.edu/Resources/PoliciesProcedures/ppm/PolicyProcedureMemoranda/Faculty_10_Interaction_with_Industry_and_Outside_Interests.pdf

JHU Policy on Conflict of Interest

http://www.hopkinsmedicine.org/Research/OPC/JHU_Conflict_of_Interest/

NIH Policy on Conflict of Interest

<http://grants.nih.gov/grants/policy/coi/>

Disclosure and Conflict of Interest (COI)

You must disclose any outside activity or financial interest listed below when it is related to your institutional responsibilities, including, but not limited to, research, teaching, clinical/practice, and administrative responsibilities.

Note that these requirements apply only to associations you have with organizations outside of JHU that are not handled through the university or sponsored projects (i.e., ORA).

You must disclose the following types of **outside activities provided to ANY entity**, whether non-profit or for-profit, regardless of whether you are paid for this activity:

<ul style="list-style-type: none">▪ Consulting▪ Publishing/editing/authoring*▪ Clinical care/practice	<ul style="list-style-type: none">▪ Board of Directors▪ Founder▪ Officer▪ Manager
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**only if remuneration is anticipated.*

You must disclose the following **financial interests in ANY entity**, whether non-profit or for-profit:

<ul style="list-style-type: none">▪ Inventor of licensed technology	<ul style="list-style-type: none">▪ Receipt of income from licenses, whether equity, royalty, or other▪ Entitlement to equity and/or royalty
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You must disclose the following types of **outside activities provided to ANY entity**, whether non-profit or for-profit, **with some exceptions:**

<ul style="list-style-type: none">▪ Service on Advisory Committees, Boards and Review Panels<ul style="list-style-type: none">○ <i>Exceptions: except when provided to a U.S. state, federal or local government agency, teaching hospital, medical center or institution of higher education or related research institute no disclosure is needed</i>	<ul style="list-style-type: none">▪ Speaking ,Teaching, Lecturing<ul style="list-style-type: none">○ <i>Exceptions: except when provided to a U.S. state, federal or local government agency, teaching hospital, medical center or institution of higher education or related research institute no disclosure is needed</i>
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Disclosure of Reimbursed or Sponsored Travel

If you are an investigator on any PHS-supported grant or contract, you need to disclose each instance of travel that is reimbursed or sponsored by an outside entity, when the amount of travel during the preceding 12 months reaches or exceeds \$5,000 in the aggregate for a particular entity. This aggregate value includes travel for family members. However, if the travel occurs in the course of your family member's own activities with the entity, you do not need to report it and it does not count towards the aggregate. Disclosures must be made within 30 days of reaching the \$5,000 threshold and of every instance of sponsored or reimbursed travel occurring thereafter.

- *Exceptions to this requirement include travel that is reimbursed or sponsored by the grantee institution (e.g., JHU), a US federal, state or local government agency, an institution of higher education, an academic teaching hospital, a medical center, or a research institute that is affiliated with an institution of higher education. Travel paid by foreign entities that reach this threshold must be disclosed.*

COI Training

All faculty members need to take **COI training** now, and every 4 years. The link to the on-line training module is here: <http://lms4.learnshare.com/l.aspx?CID=89&A=2&T=412863>

(See the reverse for information about **when to disclose, how to disclose, what happens to your disclosure after submission, and who to contact with questions.**)

When do I need to disclose?

Disclose early and often!

- Prior to undertaking an outside commitment
- Within 30 days of acquiring or discovering a financial interest related to your institutional responsibilities
- Whenever a disclosed interest or activity changes or ends (e.g., remuneration, type of services)
- When submitting a PHS grant application to ORA. ORA will provide COI certification forms you must sign that are project-specific.
- Certify annually that disclosures are accurate and up-to-date

How to disclose...

- Online disclosure system is called eDisclose: <http://edisclose.jhu.edu>
- Log in using JHED credentials

What can eDisclose do for me?

- Single portal for transactional disclosures and annual certifications
- Eliminates need to re-enter on-going activities every year
- Submit, update, terminate disclosures in one place
- Real-time access to each of your disclosures, status of review, outcome of review, and management plan/conditions
- Generate a single report of all your disclosures, for journals, conferences, etc.

What happens to my disclosures?

- Staff review disclosures for completeness and compliance with policies on conflict of interest, professional commitment, and the policy on interaction with industry
- Some disclosures are reviewed by the SPH committee on conflict of interest
- You will be notified of the outcome of the review by email that will direct you to your eDisclose account
- Conditions may apply and some arrangements may need to be modified

Questions?

Office of Academic Affairs
Miye Schakne
Research Compliance Officer
Email: mschakne@jhu.edu
Telephone: 410-502-0433

JHSPH Policy on Interaction with Industry: Commonly Encountered Scenarios

Although outside professional activities such as consulting, serving on an advisory board, or licensing an invention to a for-profit company may be mutually beneficial to academic research and the university, such activities could detract from a faculty member's primary commitment or obligations, as well as the objectivity of research. Faculty members are obligated to ensure that their external activities do not create situations where research funds are used to advance a faculty member's personal financial interests, exploit students or fellows, or compromise scientific objectivity. On the other hand, even faculty members trying to do the right thing can have difficulty in various circumstances knowing what that is. The scenarios listed below are examples of common situations that may be helpful to you. These examples are not exhaustive and are meant to supplement the information presented in the Policy and Procedure Memorandum Faculty – 10 "Policy on Interactions with Industry and Outside Interests".

I am at a conference and a drug company has a table with some really nifty umbrellas with their logo. I've always wanted an umbrella. Can I take one?

The answer is "yes" because in general, items of nominal value widely distributed at conferences by vendors (such as pens, notepads, mouse pads, coffee mugs, lanyards, umbrellas and similar items) would not be considered gifts under the policy. However, if you are a treating clinician, it is better to avoid accepting items such as this, as the regulations for clinicians are much more restrictive.

Suppose I edit a journal volume sponsored by a device manufacturer and receive \$300 for it. I later publish an article which reports on that device. Do I have to disclose the \$300 and if so, for how long?

The compensation received for editing the journal must be disclosed as an external activity. The article must include a disclosure regarding the compensation received from the company that manufactures the device. You must also disclose all such payments received in all related public presentations and publications for a period of at least one year following receipt of the payment. You are encouraged to disclose all relevant industry relationships to potential collaborators before any research begins. Being transparent about your industry relationships allows others to assess and evaluate any potential sources for bias in conducting the research before they commit to establishing a collaborative relationship.

I have been invited to speak at an event sponsored by a company or industry association, can I do so and be paid for the appearance?

You may speak at such events and receive compensation, as long as the sponsor does not have the right to dictate or control the content of your talk. However, the sponsor may set the

agenda for seminars or events for which a faculty member may be an invited speaker. For example, the sponsor may invite you to speak at the event on a particular topic or subject. You should not participate if the event is construed or marketed as if you are acting as a spokesman for the sponsor.

My research helped develop a product that is owned and marketed by an outside entity. Can I endorse this product?

No, this could be construed as an endorsement by the university of a commercial product. The company would need to seek university approval for including your name, likeness or statements from you in any advertising or other promotional materials for such products.

I am given the option of being compensated in the form of a consultant fee or in common stock (equity) for my services as a consultant to a pharmaceutical company that sponsors my research (experimental method, drug or device).

How should the compensation be handled?

If the company receives a deliverable (e.g., a report or diagnostic data) and university resources are used in the project, then the compensation would be managed by ORA as a sponsored project. This type of activity would then be included in your effort reporting.

If the activity does not involve use of university resources (e.g. service on an expert panel), the fee would be paid directly to you as personal income.

Does the form of compensation matter?

Yes, equity interests are different from consulting fees, as equity may be affected by the success of the research. Consulting fees are predetermined and independent of the research outcome. It is better to accept compensation in the form of a fee. However, both types of personal compensation require COI disclosure.

The company that helps fund my research has asked me to sign a non-disclosure agreement. The agreement contains restrictions regarding publication, including the right to review all data and a mandate to send the company all manuscripts prior to their submission for publication. Can I agree to this?

In general, you should not accept such an arrangement. While a short delay to protect patentable inventions and to ensure that proprietary information is not published may be appropriate, lengthy delays or requisite approval compromise the core value of academic

freedom, which includes the ability to freely educate, discuss, publish, and share study results. To protect your interests, all such agreements should be sent to ORA for review and signature.

We purchased a new assay machine for our lab and it's essential that a member of the lab attend one of the vendor's training sessions. The vendor pays all expenses, including travel, for clients to attend these sessions. Can we send one of our research assistants?

Yes, provided the expenses are reasonable. For example, the company should not provide gifts or entertainment in the course of the training that are unrelated to the activity.

Four professors in a common area of research have formed an LLC (a Limited Liability Company) to perform contract research with the potential for profit. Due to the success of the company, the LLC has hired some of their graduate students to assist with the workload. Are there potential conflicts generated by this arrangement?

Yes. Technically, this issue does not fall under the purview of the Policy on Interaction with Industry (instead, see PPM Faculty – 4; Conflict of Interest and Commitment). However, it is included here because activities like this may require similar management plans as those required for activities involving industry. The LLC would require disclosure to the Conflict of Interest (COI) committee prior to its formation. The COI committee would request or impose a management plan to deal with the potential conflict(s).

University resources (i.e. laboratory facilities, reagents, computers, etc.) cannot be used to support the company's activities. Faculty members cannot devote time to a company in a way that detracts from their academic duties. In general, students cannot work for a faculty-owned company such as this while they are students, and particularly if there is overlap between the student's academic plan and the company's progress. (See PPM Faculty – 10; Policy on Interaction with Industry for additional information on students).


It is important to recognize that just because something may pose a potential conflict does not mean that it is not permitted. Instead, it might simply need management to assure that financial or ethical conflicts do not arise. Development of a management plan by the COI committee helps protect you from running into difficulties now and down the road.

Questions

Questions regarding the Policy on Interaction with Industry should be directed to Miye Schakne (mschakne@jhu.edu) at 410-502-0433.

Do I need to disclose this travel expense?

* Disclosures for travel expense associated with outside activities paid directly to you or for you may include: transportation, lodging, and meals.

 You are not required to disclose these travel expenses.


NO

Do you participate in PHS funded research?


YES

Did you get reimbursed for travel from a grant, contract, or other source through the School or University?

YES

 You are not required to disclose these travel expenses.

NO

 You are not required to disclose these travel expenses.


NO


Did the amount of travel expenses received from the same entity reach or exceed \$5,000 during the 12 months preceding the disclosure?

NO

Were the travel expenses paid by any of the following: U.S.** state, federal or local government agencies, teaching hospitals, medical centers, institutes of higher education or their related research institutes?

YES

 You are not required to disclose these travel expenses.

 You must disclose the amount received for these travel expenses in eDisclose.

YES

**Travel of \$5000 or more paid by foreign entities must be disclosed.

eDisclose Travel Expense Tracking Worksheet

The following information about travel is required for entry in eDisclose. Remember, this is ONLY for travel expenses that were either paid on your behalf or reimbursed directly to you (i.e. payments that are not processed through the university) by an organization other than Johns Hopkins that have already or will likely reach \$5,000 or more in the last 12 months.

You do NOT need to disclose travel from U.S. state, federal or local government agencies (NIH, CDC, state health departments, etc), teaching hospitals, medical centers, or institutes of higher education and their related research institutes.

You need to report these expenses within 30 days of the conclusion of the trip.

1. Entity from which payment/reimbursement was received: _____

2. Departure Date: _____

Return Date: _____

3. Purpose:

Consulting

Scientific Advisory Board meeting

Sponsored research meeting

Other: _____

4. Destination (City/State or City/Country): _____

5. Reimbursed or paid expenses: (Value can be "unknown" if paid on your behalf; eDisclose does not require itemization within category but may be helpful for record-keeping)

Expense Description	Value (\$USD)
Lodging	
Transportation (air, taxi, etc)	
Meals	

**Please note this form is for tracking purposes only.
All information must be entered and submitted through eDisclose.**

Disclosure Requirements: How the Revised Federal Regulations Affect Disclosure Reporting

Category	Previously	As of August 24, 2012
Consulting for industry	Consulting fees must always be disclosed; disclosure of travel expenses has not been required.	If you participate in Public Health Service ¹ funded research, all travel expenses ² associated with outside activities paid for you or reimbursed to you by industry that reach \$5,000 within a 12 month period, must now also be disclosed. Travel expenses include transportation, hotel accommodations, and meals.
Consulting for non-profit organizations	Not required.	All payments for consulting for non-profit entities, AND travel expenses ² associated with outside activities paid for you or reimbursed to you by a non-profit that reach \$5,000 within a 12 month period, must now also be disclosed.
Teaching, lecturing or giving a seminar	Required when you are paid for speaking at an event sponsored by industry or other for-profit entity.	<p>All payments/honoraria AND travel expenses² for speaking at for-profit AND non-profit sponsored programs paid for you or reimbursed to you that reach \$5,000 within a 12 month period, must now be disclosed.</p> <p>*This does NOT include income or travel expenses received from U.S. state, federal or local government agencies (e.g., NIH, CDC, state health departments), teaching hospitals, medical centers, or institutes of higher education and their related research institutes. Examples of non-profit entities that DO require disclosure are the American Heart Association and the Gates Foundation. Foreign activities DO require disclosure.</p>
Service on boards of directors, scientific advisory boards, advisory committees, study sections or review panels	Required when you are paid for such service by an industry or for-profit entity.	All payments for serving on such boards or panels AND travel expenses ² for meetings paid for you or reimbursed to you by for-profit AND non-profit entities that reach \$5,000 within a 12 month period, must now be disclosed. Exclusions and inclusions to this requirement are the same as those listed above (*).
Interests of spouse and dependent children in for-profit entities	Required if the specific entity provides funds or materials for your research or markets products based on your research. Mutual funds are not included.	Required if these interests could be related to your institutional responsibilities (e.g., research, teaching, clinical practice).
Income received from publishing, editing or authoring	Not required.	Disclosure now required for any income paid directly to you .
Service as founder, officer or manager of a company, as well as ownership of equity in that company	Required for for-profit company.	Required for for-profit AND non-profit entities.

EXHIBIT []

THE JOHNS HOPKINS UNIVERSITY SCHOOL OF PUBLIC HEALTH UNIFORM PROVISIONS

1. **Definitions:**
 - a. “JHU” – The Johns Hopkins University, its Schools and Divisions
 - b. “Consultant” – [First name, Last name, Degrees]
 - c. “Company” – [Full Company Name]
 - d. The “Agreement” – The contract between Consultant and Company

2. **Consultant’s Obligations to JHU.** The parties acknowledge that JHU is not a party to the Agreement, which is a private contract between Consultant and Company. Therefore, JHU shall have no liability under the Agreement. Consultant shall not use the facilities, equipment, materials, funds, or resources owned or administered by JHU or located on any of the premises of JHU. Consultant shall not engage or employ students, trainees, post-doctoral fellows or other employees of JHU to provide services under the Agreement. The office address of Consultant may be identified in the Agreement for the purpose of convenient communication between Company and Consultant. JHU policies and Consultant’s obligations to JHU shall govern and be afforded primacy in the event a conflict arises between such obligations and policies and the Agreement. Consultant shall not disclose under the Agreement: (a) any invention, improvement, or other information that is proprietary to JHU and not generally available to the public other than through formal institutional transactions; or (b) unpublished results of, or unpublished data from, research or clinical activity conducted at, by, or on behalf of JHU. Nothing in the Agreement shall in any way inhibit Consultant’s ability to conduct research and other academic activities at, through, or on behalf of JHU, or to lecture upon, submit for publication, publish, or otherwise disclose the results of such activities, regardless of the sponsor or field of such activities, during or at any time after the term of the Agreement.

3. **Confidentiality Exclusions.** Nothing in the Agreement shall limit or be construed to limit Consultant’s right to use, disseminate, or publish any information that: (a) is or becomes available to the public through no breach of the Agreement by Consultant; (b) was or is obtained by Consultant from a third party who had the legal right to disclose the information to Consultant; (c) is already in the possession of Consultant at the time it is communicated to Consultant under the Agreement; (d) was developed by Consultant independently of and without reference to any information communicated to Consultant under the Agreement; or (e) is required to be disclosed by law, government regulation, or court order.

4. **Speaking, Non-Endorsement, and Publications.** Under this agreement, Consultant shall not speak with or to any third parties in any context or manner that could reasonably constitute endorsement, promotion, or marketing of any product, technology or service. In speaking with or to any third parties or if citing Consultant in any context, format, or document, the following disclaimer must be presented: “Participation by Dr. [Last name] *[in the development of this product or as an advisor, consultant, speaker, or member of the Scientific Advisory Board]* does not constitute or imply endorsement by the Johns Hopkins University.” If Consultant is listed as an author on any publication resulting from performance of services under the Agreement, the following must be added to the body of the publication: “Dr. [Last name]’s contribution to this publication was as a paid consultant to [Full Company Name].”

5. **No Conduct of Research.** Consultant shall be engaged by Company to provide expert advice only and shall not direct or conduct research, including clinical trials, for or on behalf of Company under the Agreement. Data provided to Consultant under the Agreement will not include any identifying information regarding patients or human subjects.

6. **Ownership of Intellectual Property.** Company shall have no rights under the Agreement to any publication, invention, discovery, improvement, or other intellectual property whatsoever, whether or not publishable, patentable, or copyrightable, which is developed as a result of a program of research financed in whole or in part by funds provided by or under the control of JHU. This Section 6 shall not apply to any publication, invention, discovery, improvement, or other intellectual property that results solely and directly from Consultant's services under the Agreement, either alone or with employees of or other consultants or advisors to Company.