What needs to be reported on your transactional COI form?

You must report all “Significant Financial Interests” (SFIs) held or received within the previous 12 months. An SFI is defined as “the receipt by you, your spouse, or your dependent children of any of the following, if it is related to your University responsibilities or professional expertise”:

- Income that exceeds $5,000 from any outside entity within the previous 12 months (including salary, consulting fees, honoraria, or paid authorship). This may be one payment from a particular company of more than $5,000, or multiple payments from the same company that, in the aggregate, exceed $5,000;
- Holding or Acquisition of equity in a public company that exceeds $5,000 in value;
- Aggregated income and equity/ownership interest from a public company within the previous 12 months that exceeds $5,000;
- ANY equity/ownership interest in a privately-held company; or
- Income received from rights in intellectual property and interests (e.g., patents, copyrights) within the previous 12 months.

What does not have to be reported?

- Payments (including salary, travel, and intellectual property royalties) received from Brown University;
- Income from investment vehicles, such as mutual funds and retirement accounts, as long as you do not directly control individual investment decisions (i.e. the purchase of specific stock); or
- Income for seminars, lectures, or teaching engagements from a U.S. 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.

In addition, Investigators on Public Health Service (PHS) funded research grants (e.g., NIH, AHRQ, CDC, FDA) must report the following:

- Reimbursed or sponsored travel in which the aggregate value of the travel is greater than $5,000 from a single entity within the previous 12 months, unless it is from a U.S. 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.

Examples:

Are the following reportable?

1. **Software/Apps** – Software and Apps are considered Intellectual Property (IP) and are reportable if all of the following apply:
   (a) the software or app is related to what you do at Brown (i.e. related to your field of research and expertise, your teaching and mentoring, or related to areas in which you can make purchasing or contracting decisions); **AND**
   (b) the software or app is owned by you (not Brown University); **AND**
   (c) you received income within the previous 12 months directly from another entity or company for use of the software or app (not income received via Brown’s Technology Licensing Group)

2. **Stock/Equity** – Individual stock/equity holdings are reportable if all of the following apply:
   (a) the company in which you hold the equity provides products and services or does R & D in an area related to what you do at Brown (i.e. related to your field of research and expertise, your teaching and mentoring, or related to areas in which you can make purchasing or contracting decisions); **AND**
   (b) your equity interest is greater than $5,000.
Note: stock that is part of an investment portfolio is only reportable if, in addition to (a) and (b) above, you have control over individual investment decisions (i.e. what stock to buy or sell), even if you never or rarely exercise it.

3. **My start-up company** – Yes, your start-up company is reportable if it is related to what you do at Brown (i.e. related to your field of research and expertise, your teaching and mentoring, or related to areas in which you can make purchasing or contracting decisions)

   Your company may not have an ascertainable value at this point in time. However, private equity and ownership interests must be reported regardless of current market value.

4. **My consulting business** – Yes, your consulting business is reportable if it is related to what you do at Brown (i.e. related to your field of research and expertise, your teaching and mentoring, or related to areas in which you can make purchasing or contracting decisions)

   If you are consulting as a private individual, then you must report all entities for which you consulted and from which you received >$5,000 within the previous 12 months, separately. If you are incorporated, report the total income your consulting business received within the previous 12 months. You may be asked to provide additional details about the nature of your consulting business and clients, if necessary.

5. **My work for a non-profit organization** – Yes, this is reportable if all of the following apply:
   (a) the non-profit organization or the work you do for this non-profit is related to what you do at Brown (i.e. related to your field of research and expertise, your teaching and mentoring, or related to areas in which you can make purchasing or contracting decisions); **AND**
   (b) you received >$5,000 from this organization within the previous 12 months.