

Office of the Vice Provost for Research

Comparison of Different Financial Disclosure Requirements at Penn

- PHS Financial Interest and Travel Statement (PHS-FITS) submission to your School related to applications for Public Health Service (PHS) funding
- Financial Interest Disclosure Electronic System (FIDES) submission to the Office of the Vice Provost for Research (OVPR) related to specific research projects
- Annual Extramural Activity Reporting to your School

The University’s FCOI Program, including special School-based disclosure requirements related to PHS proposals, is separate and distinct from School-based, annual extramural activities reporting.

Brief comparison of different disclosure requirements

Disclosure Process	Annual Extramural Reporting to your School	Disclosure of Financial Interests and Travel in PHS-FITS to your School	Disclosure of Financial Interests in FIDES to OVPR
Applicability	Standing Faculty, Standing Faculty-Clinician-Educators, full-time members of the Associated Faculty, Academic Support Staff, or as specified by your School	Investigators (the PD/PI and any other person, regardless of title or position, who is responsible for the design, conduct or reporting of research) participating in <u>PHS-funded research</u>	Investigators (the PD/PI and any other person, regardless of title or position, who is responsible for the design, conduct or reporting of research) participating in <u>any research</u> , regardless of funding source
When required	Once per calendar year	At the time of proposal submission, annually, when added as an Investigator to an ongoing PHS project, and prior to participation in any PHS-funded research. Must update within 30 days of a change in your financial interests.	At the time of proposal or protocol submission or when required based on PHS-FITS submission. Must update based on changes in your financial interests.
Scope	Captures financial information regarding all of your extramural activities which may involve multiple entities, whether or not related to research	Captures personal financial interests (and those of your spouse and dependent children) and sponsored / reimbursed travel that are related to your professional or employment-related responsibilities on behalf of Penn, such as research, teaching and professional practice. If PHS proposal will be/ is funded, requires an assessment of whether such financial interests / travel are related to a specific PHS proposal.	Captures retrospective, current and prospective personal financial interests (and those of your spouse and dependent children) that are relevant to an individual research project.
Timeframe	Retrospective only	Financial Interests and Travel for the past 12 months	Captures financial interests / relationships for the past 12 months through the next 12 months