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Why you disclose. Federal regulations, The University of Texas System, and The University of Texas Health Science Center at Houston (UTHealth) policies require that the university must regulate how you may participate in outside activities and hold financial interests that have the potential to affect UTHealth's interests. While the university recognizes the benefit of employees' interactions with other organizations and industry to share expertise and disseminate information, you must proactively avoid situations that give even the appearance of affecting your professional judgment. You must review each proposed outside activity with your supervisor (*e.g.*, Director, Chair, Dean) and receive [approval](#) before beginning the activity. Such review and approval will help you preserve your objectivity in the performance of your academic, research, clinical, professional, and administrative responsibilities.

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Who must disclose. Two UTHealth policies provide guidance and direction in the areas of conflicts of interest and commitment: the Conflict of Interest and Outside Activities Policy ([HOOP 20](#)); and the Research Conflicts of Interest Policy ([HOOP 94](#)).

Individuals required to submit an annual Financial Disclosure Statement include the following:

- All faculty members (including part-time faculty).
- All Administrative and Professional (A&P) employees.
- Employees, students/trainees, and others who participate in the design, conduct, or reporting of UTHealth research and have been designated as a "Covered Individual" (individuals covered by the Research Conflicts of Interest Policy, HOOP 94) by a principal investigator on a research project.
- Employees who negotiate and/or sign procurement contracts, license agreements, or research grants/contracts.
- Committee members of UTHealth research-related review committees.
- Subcontractees and consultants from other entities working on UTHealth research grants/contracts/protocols who do not have an appropriate research conflicts of interest policy in place.

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When you disclose. You are required to disclose your related outside activities and financial interests each year by March 1 using the on-line Financial Disclosure Statement form. You are also required to update your Financial Disclosure whenever your disclosure situation has changed, within 30 days of the change. Revisions to a Financial Disclosure Statement already submitted in this calendar year are made by submitting a new form.

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When you disclose: employees involved in research. Employees who are designated as a "Covered Individual" by a principal investigator on proposed research must have a Financial Disclosure Statement on file each year with the university at the time of a research application or protocol submission. You are also required to update your Financial Disclosure whenever your disclosure situation has changed, within 30 days of the change.

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When you disclose: new employees hired after January 1, 2013. If you were hired after January 1, 2013, you are required to submit your Financial Disclosure Statement within 30 days of your hire-date. You disclose your related outside activities and financial interests held during the twelve months prior to your hire-date. For example, if your hire-date is July 1, 2013, you will report your related activities and interests for the time period July 2012 through June 2013. You are also required to update your Financial Disclosure whenever your disclosure situation has changed, within 30 days of the change.

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What you disclose: “related” outside activities and interests. You are required to disclose your “related” outside activities and financial interests, (*i.e.*, those that require you to utilize the same academic, research, clinical, professional, or administrative expertise that you use in your employment or other relationship at UTHealth), whether compensated or not. You must also disclose activities and interests with any outside entity whose business is related to the education, healthcare, or research mission of UTHealth (*e.g.*, pharmaceutical companies, professional associations, non-profit health organizations, etc.). Review examples here ([Disclosure Requirements](#)).

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What you do NOT need to disclose. Review the types of activities and interests that do not need to be disclosed on your Financial Disclosure Statement here ([Disclosure Exclusions](#)).

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Disclose related outside activities/related financial interests of your Covered Family Members:

- Your spouse;
- Your dependent children and step children;
- Any person financially dependent upon you; and
- Any person with whom you have joint financial interests such that an objective third party could reasonably conclude that your decisions or other exercise of professional responsibilities at UTHealth could be influenced by the effect of that action on your financial interest.

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Preview the questions: Preview the form questions here ([Financial Disclosure Statement Questions](#)).

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No related outside activities or financial interests? If you and your Covered Family Members have no related outside activities or related financial interests to disclose, you must still answer the questions, certify that you have nothing to disclose, and submit the on-line Financial Disclosure Statement each year. The form will skip over the sections you do not need to complete.

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Instructions for completing this form. Click on the Financial Disclosure Statement link, log in with your UTHealth user name and password, and click on “Begin a New COI Form.” Most fields are required; if you have no information to enter in a text box, type in “N/A” and if you have no entries for a numeric field, enter “0.” The system saves your entries when you click on the “Save and Proceed” button at the bottom of each question. You may log out of the system and return to your form later at any time prior to submitting it. When you are ready to return, your pending form will show in the section labeled “Forms started but not yet submitted” on the first page of the system. Your pending form will start at the beginning but will show the information you have already saved; simply scroll through to the place where you want to edit and continue making your entries. At the end of the form, you will be asked to preview your form, giving you the opportunity to go back and correct errors or change entries.

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Submitting your form. At the end of the form, be sure to click on the “Submit my Completed Form” button on the last screen in order for your Financial Disclosure Statement to be recorded as formally submitted to the university.

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Submitting revisions to your Financial Disclosure. If your disclosure situation has changed, you report such changes by submitting a new Financial Disclosure Statement. You must disclose changes within 30 days of the change; do not wait until the next reporting period. A revised disclosure would be required if incorrect or estimated information was provided in the first form, or if you experienced a change in the same calendar year such as: a new advisory relationship, a new business ownership, a change in responsibilities for an existing outside activity, termination of a consulting agreement, elimination of a business interest, etc.

Log into the system with your UTHealth user name and password. Then click on “Begin a New COI Form.” You may answer “No” to all the questions that you have already submitted on your first form so you are not entering the same information twice in the same calendar year. Click on “Yes” to the question in which you need to make the revision. Important: in Question #9 (Supplemental Information) click on “Yes” and type a short statement to provide the reason for the revision. Multiple forms submitted in the year will be reviewed together.

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What happens to the information you disclose. Your disclosure will be reviewed by the Office of Institutional Compliance and may also be reviewed by your supervisor, other institutional officials, and the Institutional or Research Conflicts of Interest Committees. Activities/interests that represent potential or real conflicts may receive management plans to mitigate or manage the conflicts, and those involving federally-sponsored research must be reported to the federal sponsor. In addition, activities and interests that result in a “financial conflict of interest in research” and are being managed with a Research COI Management Plan must be posted on a UTHealth website that is available to the public ([required report](#)).

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For more information. Read the applicable policies, Frequently Asked Questions (FAQs), and other guidance posted on our [website](#). If you need assistance with completing your Financial Disclosure Statement, contact the Office of Institutional Compliance at (713) 500-3294 or Loretta.Davis@uth.tmc.edu.

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Disclosure Requirements

Examples of outside activities and financial interests that require disclosure if related to your training and expertise or to the mission of UTHealth

1. Lectures, speaking engagements, speakers bureaus, advising, consulting.
2. Scientific advisor/scientific advisory boards.
3. Data safety monitoring boards.
4. Paid authorship.
5. Development and/or provision of continuing medical or professional education.
6. Employment and service agreements.
7. Expert witness services. (Do not include compensation assigned to UTHealth via MSRDP or DSRDP.)
8. Rights to intellectual property (patents, patent applications) if personally owned by you or a family member.
9. Royalties, fees, or other payments received from an outside entity other than UTHealth, or rights to receive such payments.
10. Travel that is reimbursed or sponsored by an outside entity. (Do not include travel paid through an awarded research grant, clinical trial agreement, or other contractual agreement between UTHealth and the entity; travel for a federal, state, or local government; travel for an institution of higher education as defined by 20 U.S.C. 1001(a); or travel for an academic teaching hospital, medical center, or research institute that is affiliated with an institution of higher education).
11. Business ownership or entitlement to such an interest.
12. Stock or membership interests. (Do not include mutual funds or retirement accounts or income from such investment vehicles where you have no control over the selection of holdings or investment decisions, *e.g.*, UT-provided TRS benefits, retirement plans, pensions.)
13. Stock options.
14. Fiduciary position as a board of director, officer, executive, management position in a for-profit company, non-profit organization, professional association, etc.
15. Financial interest in any trust, organization, or enterprise over which you and/or a family member exercises a controlling interest.

Disclosure Exclusions

Outside activities and financial interests that do not require disclosure

1. Outside activities and financial interests that are not related to the academic, research, clinical, professional, and/or administrative fields for which you are employed at UTHealth (your training and expertise).
2. Salary and other remuneration paid to you by UTHealth if you are currently employed or otherwise appointed by UTHealth.
3. Royalties and fees paid to you through the UTHealth Office of Technology Management if you are currently employed or otherwise appointed by UTHealth.
4. Income from a federal, state, or local government, an institution of higher education as defined by 20 U.S.C. 1001(a), or an academic teaching hospital, medical center, or research institute that is affiliated with an institution of higher education, specifically for the following activities: seminars, lectures, teaching engagements, advisory committees, or review panels.
5. Travel that is reimbursed or sponsored through an awarded research grant, clinical trial agreement, or other contractual agreement between UTHealth and the entity; travel for a federal, state, or local government; travel for an institution of higher education as defined by 20 U.S.C. 1001(a); or travel for an academic teaching hospital, medical center, or research institute that is affiliated with an institution of higher education.
6. Stock in mutual funds or retirement accounts or income from such investment vehicles where you have no control over the selection of holdings or investment decisions (*e.g.*, UT-provided TRS benefits, retirement plans, pensions).
7. Activities and compensation resulting from professional fees that have been assigned directly to UTHealth (*i.e.*, MSRDP or DSRDP).
8. Activities that are covered under a formal contract between UTHealth and another entity where the funds are paid directly to UTHealth (*e.g.*, a sponsored research agreement).
9. Passive income (*e.g.*, alimony, child support, interest on savings and investments).

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Preview of Financial Disclosure Statement Questions

1. Employee Information.

2. Reporting Employment of Close Relatives.

Do you have any close relatives who are also employed at UTHealth? Or do you have any close relatives who are employed by or who have an ownership in a company that does business with UTHealth?

3. Reporting Gifts of Value Greater than \$250.

Did you and/or a family member receive a gift of anything that is greater than \$250 in value that may influence or have the appearance of influencing your official UTHealth job duties (e.g., your academic, research, clinical, professional, and/or administrative responsibilities)?

4. Reporting Related Outside Activities and Related Financial Interests with Entities.

Do you and/or a family member participate in related outside activities or hold related financial interests with any entity (an organization, company, foundation, trust, or other enterprise)?

5. Reporting Sponsored or Reimbursed Travel.

Did an outside entity sponsor or reimburse you and/or a family member for a trip (e.g., travel, lodging, meals, conference registration) that was related to your/their professional expertise?

6. Reporting Intellectual Property Related to Research or Clinical Services.

Are you or a family member listed as an inventor on any patents or patent applications related to your research or clinical service at UTHealth?

7. Reporting Intellectual Property Related to Instructional Media.

Did you and/or a family member create any textbook, software program, evaluation tool, or other published or licensed instructional media or materials that are currently required or recommended for use in a UTHealth instructional program?

8. Reporting Other Related Stocks and Stock Options.

Do you and/or a family member own any related stock or stock options in any entity that has not been disclosed in the previous questions whose business is related to your academic, research, clinical, professional, and/or administrative fields for which you are employed at UTHealth, or is related to the work and mission of UTHealth?

9. Supplemental Information.

Did you and/or your family members participate in any other related outside activities or hold any other related financial interests that you believe should be reported but have not been disclosed in the previous questions? Or would you like to provide any additional information you feel would assist the university in the review of your disclosure?

10. Reporting Funded Research at UTHealth.

Do you participate in research at UTHealth (funded by outside sources or internal funds)? "Participation in research" includes the design, conduct, or reporting of research.