

Sponsored Programs Conflict of Interest Policy

Purpose:

To comply with the CSU Conflict of Interest – Principal Investigators and the new Conflict of Interest Regulations issued from the federal government on grant awards from Public Health Service agencies (e.g., NIH, FDA, CDC, HRSA, SAMHSA, AHRQ, Indian Health Service and ATSDR) and NSF, as well as certain private industries.

Policy:

Statement of Economic Interest – Private Institution

State regulations require an investigator to disclose whether or not he or she has a direct or indirect financial interest in the project's sponsor. If the sponsor is a private organization, a Statement of Economic Interest (Form 700U) may be required. Disclosures of financial interest will be reviewed by an independent review committee and it will be determined if the conflict can be appropriately managed, reduced, or eliminated. CSU Principal Investigators are required to file the following Statements, as appropriate:

1. Initial Statement – The initial statement must be submitted to the Office of Grants and Contracts before final acceptance of a contract, grant, or gift. The statement shall include reportable investments in and positions with the sponsor with the sponsor as of the date of the offer of funding, and income and gifts received from the sponsor within 12 months prior to the date of the offer.
2. Interim Statement – A statement must be filed within 30 days after funding is renewed and shall disclose reportable investments, income and business positions held or received during the project period between the date the initial statement was filed and the date the funding for the project was renewed.
3. Project Completion Statement – A statement must be filed within 90 days after the gift funds are exhausted, or the research project is completed pursuant to CSU policy.

Financial Conflict of Interest (FCOI) Disclosure Statement – National Science Foundation (NSF) and Public Health Service (PHS)

Any person who will work on an NSF or PHS funded project who is responsible for the design, conduct, or reporting of work performed on the project must complete a Significant Financial Interest Disclosure statement. This disclosure includes employees of CSUF, CSU Fullerton Auxiliary Services Corporation, and all subcontractors.

The FCOI disclosure statement will be completed during the initial proposal stage and annually for all ongoing projects as follows:

1. Prior to the expenditure of funds;
2. Within 60 days of the identification of an Investigator who is newly participating in the project;
3. Within 60 days for new, or newly identified, FCOIs for existing Investigators;
4. ***ONLY FOR PHS PROJECTS*** - At least annually (at the same time as when the University is required to submit the annual progress report, multi-year progress report, if applicable, or at the time of extension) to provide the status of the FCOI and any changes to the management plan, if applicable, until the completion of the project;
5. Following a retrospective review to update a previously submitted report, if appropriate.

Once the award is received and transmitted to ASC, the appropriate FCOI/COI statement will accompany the award documents and be maintained in the grant file. Subsequent filings will be the responsibility of ASC OSP in accordance with the guidelines documented above.

For more information on the university's Conflict of Interest policies and procedures, see <http://www.fullerton.edu/research/contact-us/Policies.asp>.