

CONFLICT OF INTEREST – SPONSORED PROGRAMS POLICY #308

Policy Administrator:	Executive Director or designee
Authority:	Section 89900 of the Education Code and Section 42400 of Title 5 of the California Code of Regulations
Effective Date:	09/15
Updated:	04/25/19 (approved 06/20/19)
Cross References:	Policies #108, 208

Policy Statement: This policy complies 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.

Statement of Economic Interest – Private Institution: State regulations require an investigator to disclose whether 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:

- **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 as of the date of the offer of funding, as well as income and gifts received from the sponsor within 12 months prior to the date of the offer. Financial interests subject to disclosure are:
 - Income > \$500
 - Investments > \$2000
 - Director, Officer, Employee, Partner, Trustee, Consultant or Management position
Loan Balances > \$500
 - Personal Gifts Valued > \$50
 - Travel Reimbursements
- **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

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:

- With the initial proposal;
- Within 30 days of the identification of an Investigator who is newly participating in the project;
- Within 30 days for new or newly identified FCOIs for existing Investigators;

Additional Requirements for PHS projects only:

- With supplemental funding;
- With renewals;
- With non-competing continuations.

Once the award is received and transmitted to ASC, the appropriate FCOI/COI statement will accompany the award documents and be electronically maintained on the shared drive. Subsequent filings will be the responsibility of ASC Office of Sponsored Programs in accordance with the guidelines documented above.

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