

FORM 830-U
CALIFORNIA STATE UNIVERSITY LOS ANGELES
PROJECTS FUNDED BY PUBLIC/GOVERNMENTAL SOURCES
INVESTIGATOR'S DISCLOSURE OF FINANCIAL INTEREST

This directive provides policies and guidelines regarding disclosure of conflict of interest for Principal Investigators for all grant and contract funds awarded to the University by the National Science Foundation (NSF) or the Department of Health and Human Services (HHS) or the Public Health Service (including the National Institutes of Health (NIH)).

Background

Effective October 1, 1995, the National Science Foundation (NSF), the U. S. Department of Health and Human Services (HHS), and the Public Health Service -including National Institutes of Health (NIH) adopted parallel policies on Investigator Financial Disclosure requirements. Under these rules the grantee institution (California State Univ. Los Angeles) must comply as follows:

- develop, enforce and certify to NSF/HHS/NIH a policy to ensure that agency-funded research is not biased by investigators' conflict of interests;
- inform potential investigators of the policy and their responsibilities under the policy;
- designate institutional officials to solicit and review financial disclosure statements from each investigator planning to participate in NSF/HHS/NIH-funded research;
- provide designated officials with guidelines for identifying conflicts of interest and take action to manage, reduce, or eliminate the conflict; and,
- maintain records for at least three years (from the date the final grant expenditures report is submitted) of all financial disclosures and all actions taken by the institution.

Additionally, the grantee institution must update all financial disclosures during the period of the award either on an annual basis or as new reportable conflicts of interest are discovered.

Investigator Disclosure

Investigators must disclose significant financial interests at the time of the funding proposal, and update this information annually, or as new interests are obtained during the life of the award.

Investigator

Investigator is defined as Principal Investigator, Co-Principal Investigator, and any other person who is responsible for the design, conduct, or reporting of the sponsored project or of any related agreement in addition, disclosure must be made for each investigator's spouse and dependent children.

Significant Financial Interest

The term "significant financial interest" means anything of monetary value, including, but not limited to, salary or other payments for services (e.g., consulting fees or honoraria); equity interest (e.g., stocks, stock options or other ownership interests); and intellectual property rights (e.g., patents, copyrights and royalties from such rights). The term does not include:

- 1) salary, royalties or other remuneration from the applicant institution;
- 2) any ownership interests in the institution, if the institution is an applicant under the Small Business Innovation Research Program or Small Business Technology Transfer Program;
- 3) income from seminars, lectures, or teaching engagements sponsored by public or nonprofit entities;
- 4) income from service on advisory committees or review panels for public or nonprofit entities;

5) an equity interest that, when aggregated for the investigator and the investigator's spouse and dependent children, meets both or the following tests: does not exceed \$10,000 in value as determined through reference to public prices or other reasonable measures of fair market value, and does not represent more than a 5% ownership interest in any single entity; or

6) salary, royalties or other payments that when aggregated or the investigator and the investigator's spouse and dependent children, are not expected to exceed \$10,000 during the next funded twelve-month period.

Institutional Certification

Certification will be performed by the Dean of Graduate Studies & Research or approved designee, and will be based on information provided by the Investigator on the Conflict of Interest Disclosure Form-830-U, for each entity that may be involved. The Dean or his/her designee, will review disclosures, assess their potential for conflicts of interest, and develop resolution strategies with the Investigator to manage, reduce or eliminate such conflicts.

Resolution Plan

If the designated official(s) determines a conflict of interest exists, a Resolution Plan must be developed with the Principal Investigator and implemented prior to award. The Resolution Plan must be in writing and approved by the Associate Dean, Graduate Studies & Research - Research Administration, the College Dean, and the Provost.

Resolution Options may include but are not limited to:

- public disclosure of significant financial interests
- monitoring of research by independent reviewers
- modification of the research plan
- disqualification from participation in the portion of project affected by the significant financial interest
- divestiture of significant financial interests
- severance of relationships that create actual or potential conflicts.

Enforcement Mechanisms and Sanctions

Potential violations of the Conflict of Interest Resolution Plan shall be handled by the Conflict of Interest Resolution Committee appointed by the Provost. This committee will establish and enforce appropriate sanctions based on the specific conduct of an investigator failing to follow the agreed upon Resolution Plan.

Reporting

The Associate Dean, Graduate Studies & Research-Research Administration, will inform the National Science Foundation's Office of the General Counsel if the University is unable to satisfactorily manage a conflict of interest. In the case of the HHS or NIH, the Associate Dean, Graduate Studies & Research-Research Administration, will notify the agency's Awarding Component of the corrective action taken or to be taken if the failure of an Investigator to comply with the policy of the University has biased the design, conduct, or reporting of the agency's funded research.

Documentation and Record Maintenance

The CSULA Office of Research and Sponsored Programs, will maintain records of all financial disclosures and of all actions taken to resolve conflicts of interest for at least three years beyond the termination or completion of the grant to which they relate, or until the resolution of any federal action involving those records, whichever is longer.

CALIFORNIA STATE UNIVERSITY – LOS ANGELES
Conflict of Interest Disclosure for Principal Investigators
Form 830-U

Completion of this form (830-Ua) is required at submission for proposals submitted to the National Science Foundation, the Dept. of Health & Human Services, and the National Institutes of Health. This includes the PI and any other person responsible for the design, conduct, or reporting of research funded by NSF/HHS/NIH. It also includes the investigator's spouse and dependent children. The Principal Investigator of Record is responsible for ensuring that all project investigators submit disclosures. [Other agencies may require a different disclosure format; however, this form could be used for other agencies if acceptable].

Investigator Name: _____

Department/College: _____

Project Title: _____

Proposed Sponsor: _____

Amount of Funding Requested: \$ _____

Proposed Funding Period: From _____ To _____

I have no interests to disclose on this date.

I am disclosing the following significant financial interests related to the entity involved with the project that is proposed to the identified sponsor. (*Responses should include the investigator, his/her spouse, and any dependent children.*)

Name of Entity: _____

Address of Entity: _____

Principal Type of Business: _____

Are you a director, officer, partner, trustee, or employee of the entity? Yes No

Do you have an investment of \$ 10,000 or more in the entity? Yes No

Do you hold an equity position of 5% or more in the entity? Yes No

Do you have an interest in any intellectual property rights belonging to the entity? Yes No

Investigator Certification

- I agree to update this disclosure either on an annual basis, or as new reportable significant financial interests are obtained.
- I agree to cooperate in the development of a Resolution Plan to address any actual or potential conflict of interest identified via this Disclosure.
- I agree to comply with any conditions or restrictions imposed by CSULA to manage, reduce, or eliminate actual or potential conflicts of interest or forfeit the award.

Signature of Disclosing Investigator

Date

Endorsement

I have reviewed this financial interest disclosure and believe that no significant financial interest exists. If one does exist a Resolution Plan to manage, reduce, or eliminate any actual or potential conflict of interest has been implemented, or will be implemented prior to the award.

Signed: _____ Date: _____

Benjamin Figueroa, Director of Research Administration