
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 may be required ([California 770-U form](#)). 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.
Financial interest subject to disclosure are:
Income >\$500
Investments >\$2000
Director, Officer, Employee, Partner, Trustee, Consultant or Management position
Loan Balances > \$500
Personal Gifts Valued at >\$50
Travel Reimbursements.
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.

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

Additional Requirements *ONLY FOR PHS PROJECTS* –

4. With Supplemental Funding

5. With Renewals
6. 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 OSP in accordance with the guidelines documented above.

For more information on the university's Conflict of Interest policies and procedures, see [Conflict of Interest Implementation of PHS/NIH Policy](#)