

## Conflict of Interest

In compliance with the California State University, Fullerton's (CSUF) Conflict of Interest Policy (UPS 610.000), the CSU Fullerton Auxiliary Services Corporation (ASC) consider it a conflict of interest when financial or personal considerations may appear to compromise a Principal Investigator's (PI) or co-PI's judgment in conducting or reporting research, carrying out grant activity or conducting contracts. The [California State University Conflict of Interest Handbook \(http://www.calstate.edu/gc/Docs/ConflictofInterestHandbook.pdf\)](http://www.calstate.edu/gc/Docs/ConflictofInterestHandbook.pdf) states "The purpose of Conflict of Interest laws is to prohibit public employees from personally benefitting at the expense of the public interest." The law of conflict of interest sets forth the means by which the collision of public interest with self-interest is diminished. In ASC

Even if there is no evidence of improper actions, this appearance of impropriety can undermine confidence in the ability of that person to act properly in his/her position. In such a situation, [FORM 700U \(see http://www.fppc.ca.gov/forms/700-13-14/Form700-13-14.pdf\)](http://www.fppc.ca.gov/forms/700-13-14/Form700-13-14.pdf) must be completed by the appropriate personnel. Nevertheless, Form 700u must be filled by all persons employed by UC or CSU who have principal responsibility for a research project if the project is to be funded or supported, in whole or in part, by a contract or grant (or other funds earmarked by the donor for a specific research project or for a specific researcher) from a nongovernmental entity.

The Office of Grants and Contracts (OGC) oversees the completion of the Conflict of Interest forms by PIs during proposal preparation, prior to transmittal of an award document from a non-governmental entity for acceptance by the ASC, except for institutions approved for exemption from this requirement by the Fair Political Practices Commission. PIs are not required to fill out the 700U financial disclosure statement for research that is sponsored by the organizations identified as "exempt" and tax-exempt education institutions. A list of exempt institutions is provided at <http://www.ucop.edu/research-policy-analysis-coordination/policies-guidance/conflict-of-interest/list-of-non-governmental-entities-exempt-from-disclosure-requirement.html>. The Office of Sponsored Programs (OSP) oversees the completion of a final Conflict of Interest Form upon close out of the award. Originals of all 700U forms are maintained by the OSP and kept in each individual project file.

ASC's [Conflict of Interest Policy](#) does not prohibit the appointment of closely related individuals (husbands, wives, mothers, fathers, sons, daughters, sisters, brothers, or partners) to a project so long as the PI does not supervise or otherwise make personnel-related decisions regarding that relative. Transactions between the PI and the related employees must be consistent with that of other employees.

### CONFLICT OF INTEREST TRAINING

Prior to acceptance of an award from a nongovernmental entity (identified as non-exempt), a Principal Investigator (PI) is required to file form 700-U, "Statement of Economic Interests for Principal Investigators." Upon receipt of a completed and signed Form 700-U, the Office of Grants and Contracts (OGC) will send a scanned copy to Human Resources, copying Office of Sponsored Programs (OSP). Form 700-U interim disclosures are collected by OSP and a copy will be sent to Human Resources.

Upon receipt of the Form 700U, Human Resources will determine if a CSU COI training is required and will notify the PI/co-PI (filer) of the CSU Ethics/Conflict of Interest (COI) training requirement. COI training is required within 30 days of acceptance of an award and every two years thereafter. A report of PI/co-PIs who have completed COI training, dates of completion, and dates of next required training will be provided to OSP by Human Resources annually, at the beginning of each fiscal year.