

California State University, Fresno Division of Research and Graduate Studies

Standard Operating Procedures (SOP) - Conflict of Interest (COI)

Per the CSU Chancellor's Office, project directors are required to complete a Statement of Economic Interests form for each non-governmental grant received, as well as grant awards from the National Institutes of Health (NIH) and the National Science Foundation (NSF). Principal Investigators (PIs) submitting research proposals for funding by external agencies must file a conflict of interest form for each research project proposal submitted unless the funding agency is *exempt* (defined below). This policy sets institutional Conflict of Interest standards and practices applicable to Investigators on grants and contracts. This is required as part of the CSU, Fresno compliance procedure that must be completed prior to submitting the proposal to the agency.

Exempt Agencies

PIs requesting funding from federal, state, county, and city government are exempt from filing conflict of interest forms unless the proposal is created for the National Science Foundation (NSF) or the National Institutes of Health (NIH). The following link gives a list of private non-profit agencies that have been determined to be *exempt* by the California Fair Political Practices Commission: <http://www.fppc.ca.gov>. Principal Investigators applying to federal agencies requiring Financial Conflict of Interest disclosure (e.g. NIH, NSF) must complete the Federal Disclosure form.

Federal Disclosure Form

PIs applying to the NSF or NIH agencies must file the Federal Disclosure form. In accordance with NSF and NIH guidelines, it is the responsibility of the PI to update their financial disclosure if a new reportable "Significant Financial Interest" is obtained during the term of the project.

California Form 700-U

PIs with proposals for funding from all other sources (i.e., not exempt and not NSF or NIH funded) must file the one page California form 700-U.

California regulations require:

- Annual update of form 700-U
- California state ethics training the first year and each two years thereafter
- A final form 700-U submitted within 90-days after the project ends.

Archival Storage for Proposal COI Forms

Original signed form 700-U and Federal Disclosure forms prepared as part of the proposal submission process will be stored in the Research Compliance Office.