

**INTERIM PROCEDURES FOR CONFLICT OF INTEREST  
POLICY FOR PRINCIPAL INVESTIGATORS**

**I. GUIDELINES FOR IMPLEMENTATION**

A principal Investigator shall not make, participate in making, or use the position to influence the making of any governmental action or decision which will foreseeably have a material financial effect on:

1. Any business entity and/or real property in which the designated employee has a direct or indirect investment or interest, worth more than one thousand dollars (\$1,000);
2. Any source of income, other than loans by a commercial lending institution in the regular course of business on terms available to the public without regard to official status, aggregating two hundred fifty dollars (\$250) or more in value provided to, received by, or promised to the designated employee within twelve (12) months prior to the time when the decision is made; or
3. Any business entity in which the principal investigator is a director, officer, partner, trustee, or employee or holds any position of management.
4. A close relative defined as son, daughter, brother, sister, mother, father, spouse, domestic partner or significant other, step relative or in-laws.

Financial disclosure by Principal investigators is required whenever the principal investigator applies for a nongovernmental contract or grant. No nongovernmental contract or grant may be accepted without the Principal Investigator filing a financial statement.

Principal investigators shall provide the university grants and research office with a copy of any conflict of interest statement submitted to a sponsor.

**II. Procedures**

To ensure that the principles essential to research are followed and to comply with conflict of interest disclosure requirements as stated above, the following procedures have been established for all research grants, contracts, and gifts which may be or have been sponsored by nongovernmental entities or nonprofit organizations that are not on the Fair Political Practices Commission (FPPC) approved list.

- (1) Principal Investigators must complete the required financial disclosure statement (Principal Investigator's Statement of Economic Interests - Form 730-U) and submit this form with the Project information Form (PIF) for all new and continuation projects.
- (2) If the financial disclosure statement indicates that the principal investigator has no financial interest in the sponsoring entity, then the form will be filed with the Vice President for Administration and University Relations and the CSUF Foundation will be notified that an award for the proposal may be accepted.
- (3) If the financial disclosure statement indicates that the Principal Investigator has a financial interest in the sponsoring entity, then the form will be forwarded to the Chairman of the Campus Independent Review Committee for review and recommendation. (The composition and function of the Independent Review Committee is described below.) This Committee will recommend to the President or designee whether funding for the proposal should be accepted and, if so, whether any conditions are needed. The

Foundation will be notified that an independent substantive review of the disclosure statement and research project must take place prior to acceptance of a contract, grant, or gift.

- (4) Department chairs shall disqualify themselves from approving a research proposal for a project to be funded in whole or in part by a nongovernmental entity in which they have a financial interest.
- (5) The financial disclosure statements must also be filed within ninety (90) days after expiration of a grant or contract or after funds have been expended, in the case of a gift.

### III. INDEPENDENT REVIEW COMMITTEE

The Independent Review Committee shall be composed of at least three individuals:

- (1) A faculty or staff person, as appropriate, from another department or occupational area;
- (2) An administrator; and
- (3) A member at large.

The Committee shall assure that appropriate administrative support and technical conflict of interest advice is available to Principal Investigators and others as needed; that application and project completion financial disclosure statements are filed within pre-scribed deadlines; that such statements are complete, legible, and consistent; and that independent substantive review of potential conflicts of interest is completed before deciding whether to accept a contract or grant sponsored in whole or in part by a nongovernmental individual or entity.

Based upon Trustee policy and the *California Code Of Regulations* the Committee shall consider in its review the appropriateness of the research to the University, the appropriateness of use of University facilities, the openness of the research/teaching environment, and the freedom to publish and disseminate research and/or project results. This Committee shall maintain records of its deliberations which shall be made available to the public upon request.

The Committee will recommend to the President or designee whether funding for the research project should be accepted and, if so, whether any conditions are needed.

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Approved by the President as Interim Policy      June 29, 2004