



University Policy Statement

UPS 610.000

**CONFLICT OF INTEREST POLICY
FOR
EXTERNALLY FUNDED PROJECTS**

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CONFLICT OF INTEREST POLICY FOR EXTERNALLY FUNDED PROJECTS

I. Introduction and Purpose

- A. California State University, Fullerton (“CSUF”, “University”) recognizes that several conflict-of-interest policies issued by internal and external bodies currently govern specific units on campus or specific categories of employees. The University also recognizes that the diversity of situations in which faculty and staff conduct research and instruction and the diversity of potential financial arrangements may make it difficult to establish what does or does not constitute a conflict of interest.
- B. The purpose of this policy statement is therefore to declare the general principles that should be observed in all cases and to specify additional procedures and policies for meeting the requirements of particular federal funding agencies and nongovernmental sponsors.

II. General Policy

It is the general policy of CSUF that:

- A. the quality or objectivity of academic work should not be compromised by, or appear to be compromised by, financial interests the project personnel have in the conclusions or recommendations derived from the project. Project personnel include the Principal Investigator and all other CSUF or auxiliary employees who share responsibility for the design, conduct or reporting of research and sponsored projects.
- B. the decisions about the use of University resources in an academic project should not be guided, or appear to be guided, by considerations of personal economic interests.
- C. explicit procedures and structures for defining, disclosing, and resolving such conflicts shall be established, but these procedures and structures should have the flexibility to accommodate a wide variety of situations.

III. Existing CSUF Structure and Procedures

- A. CSUF complies with existing processes and procedures for identifying and resolving potential conflicts of interest, including but not limited to:
 - 1. the California Fair Political Practices Commission regulations that require financial disclosure from each CSU employee who receives funding from a non-governmental sponsor;

2. the requirements under the Fair Political Practices Commission that each CSUF administrator shall disclose financial interests that might be affected by decisions within their sphere of influence;
 3. the requirements under Sections 89906 through 89909 of the California Education Code that directors of CSU auxiliary organizations shall certify that they do not have conflicts in matters that come before them as directors;
 4. the provisions of state codes and regulations that no state employee shall use state resources for private interests;
 5. the provisions of the California Education Code, Section 89006, specifying that no employee of the university or its auxiliaries shall use confidential information obtained by reason of their employment for personal interest;
 6. the requirements of the Integrated California State University Administrative Manual (ICSUAM) Section 11010.02;
 7. all applicable federal regulations.
- B. It is the intent of the University that these procedures and standards should be coordinated and made consistent to the maximum extent possible, in order to ensure similar treatment of similar situations and in order to facilitate widespread understanding of the policies.
- C. The terms personal interest, personal economic interest, financial interest, and private interest are defined under State of California and Federal regulations and policies. They include anything of monetary value that meets the State or Federal thresholds for disclosure.

IV. Composition and Function of University Conflict of Interest Committee

- A. Any positive disclosure by a University or auxiliary employee shall be reviewed by the University Conflict of Interest Committee. The committee is comprised of:
1. five faculty members elected by the Academic Senate; no two of whom shall be from the same college.
Each faculty member appointed to the Conflict of Interest Committee shall serve a term of three (3) years.
 2. The Director of Sponsored Programs, as a voting member.
 3. An administrator appointed by the Vice President for University Advancement, as a voting member.
 4. The Associate Vice President for Research and Sponsored Projects (ORSP), or their designee, as a non-voting member.
 5. The Director of the Office of Grants and Contracts, as a non-voting member.
- B. The Office of Research and Sponsored Projects shall provide staff support to the University Conflict of Interest Committee.

V. Policy for Projects Funded by the Federal Government

- A. For any federal agency that requires financial conflict of interest disclosure from the Principal Investigator and/or other University or auxiliary personnel who share the responsibility for the design, conduct or reporting of federally-funded research, the University shall comply with all applicable federal conflict of interest regulations including agency-specific requirements and/or applicable program guidelines.
- B. For Public Health Service (PHS)-sponsored projects, CSUF adopts the policies set forth in the regulations of the US Department of Health and Human Services, as amended at the time a proposal or award is made. Additionally, the University has implemented and complies with “Implementation of the Financial Conflict of Interest Policy for PHS Sponsored Project” (effective August 24, 2012).

VI. Policy for Projects funded by Other Entities

- A. CSUF and its auxiliaries shall comply with the California Fair Political Practices Commission (“FPFPC”) regulations on Conflicts of Interest (Chapter 7, Reg 18700 – 18756, or as amended).
- B. The Principal Investigator and all other CSUF and/or CSU Fullerton Auxiliary Services Corporation personnel who share responsibility for the design, conduct or reporting of a funded project shall disclose their personal financial interests in any organization that funds or supports their sponsored project.
- C. In the case of gifts to the university that are earmarked for a particular faculty member or particular project and administered by Cal State Fullerton Philanthropic Foundation (“CSFPF”), CSFPF shall carry out the duties in adhering to and implementing the requirements of this Conflict of Interest policy.

Source: Faculty Research Policy Committee

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