



Financial Conflict of Interest Procedure

Issued Revision: August, 2007

Implemented: March, 2008

POLICY BACKGROUND

SFSU requires Principal Investigators (PI's) and key personnel on a sponsored project to disclose a listing of significant financial interests (and those of their spouse and dependent children) that could be reasonably expected to bias the design, conduct, or reporting of the project.

All PI's, Co-PI's and Key Personnel listed in a proposal for external funding must complete a disclosure form before expenses can be charged to an award.

PROCEDURE

ORSP PRE-AWARD

A. Conflict of Interest Documentation

1. The PI must complete the following forms before a proposal can be submitted:
 - a. Disclosure of Financial Interests Related to Projects Sponsored by NSF, PHS, or other Agencies Adopting the Federal Requirement (see attachment).
 - b. California Form 700-U (see attachment).
2. The Proposal Specialist keeps a copy of the completed form in the proposal folder.

B. Certification

The Associate Vice President for Research and Sponsored Programs reviews the signed Conflict of Interest Disclosure form, and assesses the potential for conflicts of interest.

C. Management of Conflicts of Interest

If necessary, the Associate Vice President for Research and Sponsored Programs will develop resolution strategies with the PI to manage, reduce, or eliminate conflicts of interest.

ORSP POST-AWARD

A. Review and Update Conflict of Interest Disclosures

1. The Grants Administrator (GA) reviews Conflict of Interest documentation in the proposal folder.
2. The GA reviews the Conflict of Interest forms with the PI to ensure that a revision is not needed.
3. The GA notifies the Compliance Officer of any Conflict of Interest.

ORSP COMPLIANCE

A. Review Conflict of Interest Documentation

1. The Compliance Officer ensures that Conflict of Interest documentation is complete and current.
2. The Compliance Officer distributes Conflict of Interest Disclosure forms to those PI's with awards that require annual re-certification.

RELATED DOCUMENTS

- [Disclosure of Financial Interests Related to Projects Sponsored by NSF, PHS, or other Agencies Adopting the Federal Requirement Fiscal Affairs Closeout Checklist](#)
- [California Form 700 U-Statement of Economic Interest for Principal Investigators](#)