



CALIFORNIA STATE UNIVERSITY, LONG BEACH

OFFICE OF RESEARCH & SPONSORED PROGRAMS

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# Financial Conflict of Interest Policy

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## 1.0 Purpose

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“(1) A financial interest consisting of one or more of the following interests of the Investigator (and those of the Investigator’s spouse and dependent children) that reasonably appears to be related to the Investigator’s institutional responsibilities:

(i) With regard to any publicly traded entity, a significant financial interest exists if the value of any remuneration received from the entity in the twelve months preceding the disclosure and the value of any equity interest in the entity as of the date of disclosure, when aggregated, exceeds \$5,000. For purposes of this definition, remuneration includes salary and any payment for services not otherwise identified as salary (e.g., consulting fees, honoraria, paid authorship); equity interest includes any stock, stock option, or other ownership interest, as determined through reference to public prices or other reasonable measures of fair market value;

(ii) With regard to any non-publicly traded entity, a significant financial interest exists if the value of any remuneration received from the entity in the twelve months preceding the disclosure, who an th8.7 (sth)5.2 (e 0.6 (to)7.

state, or local government agency, an Institution of higher education as defined at 20 U.S.C. 1001(a), an academic teaching hospital, a medical center, or a research institute that is affiliated with an Institution of higher education.”

#### Investigator

Investigator is defined as the Principal Investigator (PI) or Project Director (PD), the Co-PI or Co-PD, and any other person, regardless of title or position, who would be responsible for the design, conduct, or reporting of research funded by the PHS or proposed for such funding, including non-CSULB Investigators, consultants, and unpaid collaborators. CSULB DRC is required to consider the role, rather than the title, of those involved in r,

proposal routing package for review by the Senior Director of Sponsored Programs to ensure the form is complete and for subsequent review by DRC and campus administrators or if subsequent to proposal submittal will forward the Federal FCOI disclosure form to the DRC for review.

Prior to accepting an award from nonexempt private spons-sc1k3 (rd)l6-3.2 (taTc 0.0061Tw 12.435,)-2.1tl

calendar year period that the grant is in place. <http://www.calstate.edu/HRAdm/pdf2014/HR2014->

#### 4.5 Reporting Financial Conflicts of Interest to PHS

CSULB ORSP DRC will submit a report to NIH or other PHS-funded agency regarding any Investigator SFI found by the Institution to be a FCOI in accordance with the regulation prior to expenditure of any funds under a PHS-funded research project. CSULB ORSP will also provide an FCOI report whenever an Investigator does not timely disclose a SFI or whenever CSULB ORSP, for whatever reason, does not review a disclosed SFI and the Institution then determines that a FCOI exists.

CSULB ORSP will submit an FCOI report within sixty (60) days after its determination that an FCOI exists for an Investigator who is newly participating in the project or for an existing Investigator who discloses a new SFI to the Institution during the period of award. CSULB ORSP will implement, on at least an interim basis, a management plan that shall specify the actions that have been, or will be, taken to manage such FCOI going forward and submit an FCOI report to the NIH or other PHS-funded agency.

CSULB ORSP will also, within 120 days of the determination of non-compliance, complete a retrospective review of the Investigator's research activities and the PHS-funded research project to determine whether any PHS-funded research, or portion thereof, conducted during the time period of the non-compliance, was biased in the design, conduct or reporting of such research. Based on the results of the retrospective review, if appropriate, CSULB ORSP will update the previously submitted FCOI report; specify the actions that will be taken to manage the FCOI going forward. If bias is found, CSULB ORSP will notify the funding agency promptly and submit a mitigation report that includes the key elements documented in the retrospective review and a description of the impact of the bias on the research project and the Institution's plan of action or actions taken to eliminate or mitigate the effects of the bias.

Thereafter CSULB ORSP will submit FCOI reports to the PHS-funded agency annually for any FCOI



- (C) How the management plan is designed to safeguard objectivity in the research project;
- (D) Confirmation of the Investigator's agreement to the management plan;
- (E) How the management plan will be monitored to ensure Investigator compliance; and
- (F) Other information as needed.

Form	Description of Use
<a href="#">Form 700U</a>	Must be completed (wet signature required) by Investigator for financial disclosure prior to receiving sponsored funding from a non-governmental entity.
<a href="#">Federal Conflict of Interest Disclosure Form</a> (federal)	Must be completed by Investigator for financial disclosure when Investigator prior to submitting for sponsored funding from a government agency that requires disclosure of Significant Financial Interests such as NSF and PHS-funded research.
<a href="#">Subrecipient Information Form</a>	Must be completed by potential subrecipients or subcontractors to provide contact and regulatory compliance information and disclosures.

## 6.0 Record Retention

All documents and records are maintained in accordance with the CSULB ORSP Record Retention Policy.

Record	Retention
Federal FCOI disclosure form and all documents related to the management of an FCOI	Three years
Form 700U	Seven years

## 7.0 Definitions

Refer to the following table for definitions as used in Conflict of Interest Policy.

Term or Acronym/Abbreviation	Description
Financial Conflict of Interest	A Financial Conflict of Interest (FCOI) exists when the Institution, through its designated official(s), reasonably determines that an Investigator's Significant Financial Interest is related to an NSF-, PHS-, or other funded research project and could directly and significantly affect the design, conduct, or reporting of the NSF-, PHS- or other- funded research.
Institutional Responsibilities	Institutional responsibilities are defined by the 2011 revised PHS regulation as an Investigator's professional responsibilities on behalf of the Institution, and as defined by the institution in FCOI policy, which may include, for example, activities such as research, research consultation, teaching, professional practice, institutional committee memberships, and service on panels such as Institutional Review Boards, or Data and Safety Monitoring Boards.

Investigator	In this policy investigator means the project director or principal investigator and any other person, regardless of title or position, who is responsible for the design, conduct, or reporting of research funded by NSF, PHS, or other agencies adopting the federal requirements, or proposed for such funding, which may include, for example, collaborators or consultants. For sponsored projects funded by non-governmental agencies or government agencies with contractual conflict of interest clauses the institution officials may determine that investigators are limited to the PI or Co-PIs of the sponsored program.
Significant Financial Interest	Interest that would create a conflict of interest is defined as any financial interest that a principal investigator would have that would reasonably appear to be directly and significantly affected by sponsored activities or any interest that a principal investigator would have in entities whose financial interest would reasonably appear to be directly and significantly affected by sponsored activities.

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