

CSUSM Corporation
Disclosure of Financial Interests Related to Projects Sponsored by
PHS, NSF, or other Agency Adopting the Federal Requirements

In accordance with CSUSM Corporation Sponsored Projects Conflict of Interest Policy, the Principal Investigator and all other investigators must disclose their personal significant financial interests (and those of their spouse/registered domestic partner and/or dependent children) related to their institutional responsibilities. This includes the Principal Investigator, Co-Investigators, Senior and Key Personnel, and any other individual who is responsible for the design, conduct, or reporting of research funded by the Public Health Service (PHS), National Science Foundation (NSF), or other sponsors that have adopted the federal requirements for financial disclosure. The information contained in this form may be released or transmitted to the sponsor, including federal agency representatives, and in accordance with the California Public Records Act, it may also be released to the public upon request.

Investigator: Name, Last _____ First _____ MI _____

Department _____ Project Begin Date _____

Project End Date _____

Proposal/Project Title: _____

<u>Sponsor:</u>	<u>This submission is for (check one):</u>
<input type="checkbox"/> PHS (e.g., NIH, HRSA, AHRQ, SAMHSA)	<input type="checkbox"/> New Proposal <input type="checkbox"/> Competing Continuation (Renewal)
<input type="checkbox"/> NSF	
<input type="checkbox"/> Subcontract of PHS/NSF funds from: _____	<input type="checkbox"/> New Investigator Added to Project
<input type="checkbox"/> Other: _____	<input type="checkbox"/> Change in Financial Interest
	<input type="checkbox"/> Annual / Non-competing Continuation (Renewal)

Disclosures and Certification

Each Investigator's signature acknowledges responsibility to provide a complete disclosure of all reportable financial interests prior to award receipt, as those interests change, or on an annual basis during the project award period, as required by the funding agency. The Investigator agrees to cooperate in the development of a Resolution Plan to address any actual or potential conflicts of interest identified via this disclosure. The Investigator agrees to comply with any conditions or restrictions imposed by CSUSM to manage, reduce, or eliminate actual or potential conflicts of interest or forfeit the award.

Do you, your spouse or registered domestic partner, or dependent children have any significant financial interests related to your Institutional Responsibilities? (Definitions are specified on page 3 of this form.)

No Yes, Investigator's Disclosure of Financial Interests Addendum is attached in a sealed envelope (Please type or print information)

Do you (or will you) benefit from any reimbursed or sponsored travel related to your Institutional Responsibilities? See attached Addendum for more details on what is reportable.

No Yes, Investigator's Disclosure of Financial Interests Addendum is attached in a sealed envelope (Please type or print information)

Acknowledgement and Certification

I certify under penalty of perjury that this is a complete disclosure of all my significant financial interests related to my institutional responsibilities and that I have used all reasonable diligence in preparing this Financial Interest Disclosure and that, to the best of my knowledge and belief it is true and complete. I also acknowledge by signing my name below that it is my responsibility to disclose, within 30 days, any new significant financial interests obtained during the term of the project period.

Investigator's Printed Name _____

Signature of Investigator _____

Date _____

(Attach additional disclosures, as required, to identify and include financial disclosure information for all Investigators.)

Non-CSUSM Investigators: Will Non-CSUSM Investigators be involved with the PI or campus co-investigators, in the design, conduct or reporting of the activities associated with the project (e.g., subcontractors, consultants, others with significant responsibilities)?

NO YES

If Yes, CSUSM must be assured that the affiliated institution has policies that comply with the funding agency's regulations. Such assurance should be provided along with the participant's letter of commitment to the project. For PHS funded projects, the subrecipient/collaborator must indicate their compliance with PHS regulations, or that they will follow the CSUSM Corporation Sponsored Projects Conflict of Interest Policy.

OGSR/OSP Reviewer _____

Form complete if no interest disclosed. If SFI disclosed, forward to institutional official

Date _____

Designated Institutional Official Endorsement:

I have reviewed this financial interest disclosure and believe that no significant financial interest exists, or if one does exist that a Resolution Plan to manage, reduce, or eliminate any actual or potential conflict of financial interest has been implemented. I recommend that funds be expended.

Signature of <Insert Designated Institutional Official Title> _____

Date _____

**CSUSM Corporation
Investigator's Disclosure of Financial Interests Addendum**

I have reportable financial interests declared on the attached Financial Interest Addendum forms (one for each interest).

Name of Interest/Entity:

Address of Interest:

Owner(s) of Interest:

Principal Type of Business:

Do you have an investment of \$10,000 (\$5,000 for PHS) or more in the entity?	<input type="checkbox"/> No	<input type="checkbox"/> Yes
Do you hold an equity position of 5% or more in the entity?	<input type="checkbox"/> No	<input type="checkbox"/> Yes
Are you a director, officer, partner, trustee or employee of the entity? <i>If "yes," please specify below</i>	<input type="checkbox"/> No	<input type="checkbox"/> Yes
Do you have intellectual property rights (patents, copyrights) being used by the entity or "interest"? <i>If "yes," please specify below</i>	<input type="checkbox"/> No	<input type="checkbox"/> Yes
Is there an agreement between you and the entity or "interest" for deferred remuneration, compensation, or financial gain of any kind? <i>If "yes," please specify below</i>	<input type="checkbox"/> No	<input type="checkbox"/> Yes
For PHS-funded Investigators, do you (or will you) receive reimbursed or sponsored travel related to your Institutional responsibilities? This does not include travel that is reimbursed or sponsored by a federal, state, or local government agency, an institution of higher education, academic teaching hospital, medical center, or research institute affiliated with an Institution of higher education. <i>If "yes," please indicate purpose of trip, sponsor/organizer, destination, and duration below</i>	<input type="checkbox"/> No	<input type="checkbox"/> Yes
Purpose of trip	Sponsor/organizer	Destination

Acknowledgement and Certification

I certify under penalty of perjury that this is a complete disclosure of all my significant financial interests related to my institutional responsibilities and that I have used all reasonable diligence in preparing this Financial Interest Disclosure and that, to the best of my knowledge and belief it is true and complete. I also acknowledge by signing my name below that it is my responsibility to disclose, within 30 days, any new significant financial interests obtained during the term of the project period.

Investigator's Printed Name

Signature of Investigator

Date

Instructions

For PHS and NSF:

1. The Principal Investigator (PI) and each Investigator must sign the Disclosure and forward it to the Office of Graduate Studies and Research with the complete proposal package.
2. Investigators having a significant related financial interest must also complete the **Investigator's Disclosure of Financial Interests Addendum**. Allow sufficient time for the Designated Institutional Officials and, where needed, the Conflict of Interest Review Committee (CIRC), complete a review, if necessary, and make a recommendation on award acceptance.
3. Submission of this form is also required on an annual basis for non-competing continuation awards (for PHS), when a new Investigator is added to the project, or when an Investigator's financial interests increase, whichever comes first.

For PHS:

1. The de minimis disclosure threshold for a Significant Financial Interest on PHS funded projects is \$5,000, which generally applies to payments for services and equity interests. This includes any equity interest in non-publicly traded entities.
2. PIs are required to disclose the occurrence of any reimbursed travel or sponsored travel related to Institutional responsibilities (including purpose of trip, sponsor/organizer, destination, and duration). Disclosure of travel reimbursements and Sponsored Travel **does not include** travel that is reimbursed or sponsored by a federal, 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 (including CSU auxiliary organizations).

For other Sponsors who have adopted the Federal disclosure requirements:

1. The Principal Investigator (PI) and each Investigator must sign the Disclosure and forward it to Office of Graduate Studies and Research with the complete proposal package.
2. Investigators having a significant related financial interest must also complete the Investigator's Disclosure of Financial Interests Addendum.

Definitions

Who Must Disclose? Any individual meeting the definition of "Investigator", which 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 funded research (or proposed for research funding), which may include, for example, collaborators or consultants, and any other individuals (including personnel from other institutions) who are involved in accomplishing project objectives. "Investigator" may also include students, graduate and undergraduate, and other personnel who may be listed as authors on project results, even if they are not paid from the project.

What is a "Significant Financial Interest"? Anything of monetary value, including, but not limited to:

1. Income exceeding \$10,000 (or \$5,000 for PHS projects), when aggregated, for an Investigator and the Investigator's spouse and dependent children from a single Entity (Business, Public or Nonprofit) including salary, consultant payments, honoraria, royalty payments, dividend, loan, or any other payments or consideration with value. Income from a Public or Nonprofit Entity for seminars, lectures, teaching engagements, or service on advisory committees or review panels is exempt;
2. Equity in the form of stock, stock options, real estate, loan to, or any other investment or ownership interest exceeding \$10,000 and does not represent more than a 5% ownership interest in any single entity (or \$5,000 for PHS projects for any ownership interest), for any one enterprise when aggregated for an Investigator and the Investigator's spouse and dependent children;
3. A management position such as board member, director, officer, partner or trustee held by the Investigator, the Investigator's spouse and/or dependent children; or
4. Intellectual property interest held by the Investigator, or Investigator's spouse or dependent children on a patent, patent application, or a copyright of software assigned or to be assigned to a party other than the CSU.

Financial Interest does **not** include (1) payments made by CSUSM or CSUSM Corporation (salary, royalties, honoraria, expense reimbursement or any other remuneration) or (2) an investment by a mutual fund, pension fund or other investment fund over which the investigator or his/her immediate family member does not exercise management of fund investment.

What is a "Related Financial Interest"? The work to be performed under the sponsored project and results therefrom would reasonably appear to affect the financial interest of the Investigator or the financial interest of the Entity in which the Investigator has an interest. The following are financial interests "related" to a sponsored project:

1. The Investigator is conducting a project where the results could be relevant to the development, manufacturing, or improvement of the products or services of the entity in which the Investigator has a financial interest;
2. The Investigator has a financial interest in an entity which might manufacture or commercialize a drug, device, procedure or any other product used in the project or that will predictably result from the project;
3. The Investigator has consulting income in his/her professional field that exceeds \$10,000 from a single entity during the prior twelve months. The Conflict of Interest Committee will provide an assessment for the <Designated Official Title> as to whether any of that entity's financial interests, or the Investigator's financial interests related to consulting for that entity, would reasonably appear to be affected by the federally-sponsored research;
4. The Investigator has a financial interest in an entity and the sponsored project proposes to subcontract a portion of the work, or lease property, or make referral of participants to, or make purchases from the entity; or
5. The Investigator has a financial interest in an entity that is part of a consortium or that will otherwise participate in the sponsored project.

Review Process

Identified conflicts of interest are reviewed prior to expenditure of funds by the Dean of Graduate Studies and Research and Director of Sponsored Projects to determine whether an Investigator has a Significant Financial Interest (SFI) related to the Investigator's institutional responsibilities that meets or exceeds the regulatory definitions of SFI. If a SFI or the appearance of a significant financial interest is determined, an ad hoc independent review committee will be formed to make recommendations for the management of the conflict(s) as necessary. The Conflict of Interest Review Committee (CIRC) consists of the following: two faculty selected in consultation with Academic Senate, one administrator from CSUSM Corporation, Dean OGSR, and VPFAS or designee. See CSUSM Corporation CSUSM Corporation Sponsored Projects Conflict of Interest Policy.

Records: The information provided herein may be released or transmitted to the sponsor, including federal agency representatives, and according to the California Public Records Act, may also be released to the public, upon request. These records will be retained for 3 years after termination of the sponsored project or until resolution of any action by the sponsor, whichever is greater.