

# Financial Conflict of Interest

An investigator is said to have a financial conflict of interest when that individual has the potential to gain financially from certain research results, or from certain collaborations. The state and some federal agencies have issued policies that must be followed when applying for certain types of funding. These policies describe what financial interests must be disclosed, and how to mitigate or eliminate existing or potentially significant financial interests. Please view our Procedures for detailed information regarding these policies and disclosure requirements, or view a summary of requirements below.

Our procedures and website reflect the most common conflict of interest requirements. However, additional federal agencies or private entities may have conflict of interest disclosure requirements written into the call for proposal, award letters, contracts, or cooperative agreement documents. While we may not have a written procedure for those specific requirements, they must be followed when they apply.

Questions about Financial Conflict of Interest disclosures can be directed to Leah Vargas at [leah.vargas@csus.edu](mailto:leah.vargas@csus.edu).

## CALIFORNIA POLICY

The principal conflict of interest law in California is the Political Reform Act of 1974, administered by the [California Fair Political Practices Commission](#). A principal investigator seeking funds or support, in whole or in part, for a grant or contract with a nongovernmental entity must disclose any financial interests they may have *with that entity*.

### Disclosure Requirement

Principal Investigator disclosures are documented on Form 700-U “Statement of Economic Interests for Principal Investigators” for an initial or renewal submission of a grant or contract.

### [Disclosure Form: 700-U](#)

### Training

The CSU’s ethics training must be completed within six months of receiving the grant and every two years after award for the life of the grant or contract. This training is administered by HR.

### Exempt from 700-U Submission

[Sponsors of Research Exempted from the Nongovernmental Entity Financial Disclosure Requirement](#)

## PHS POLICY

The [Public Health Services Financial Conflict of Interest](#) policy requires principal investigators and key personnel to disclose any significant financial interests *related to their institutional responsibilities* with the intent of identifying and mitigating potential researcher bias.

## Disclosure Requirement

Principal Investigators and key personnel are required to submit a disclosure statement prior to proposal submission and every year during the life of the grant or contract, unless disclosure is triggered by another event prior to an annual disclosure.

## [PHS Disclosure Form](#)

## Training

Principal investigators and key personnel are required to complete conflict of interest training prior to conducting research and every four years after award for the life of the grant or contract. Training is offered through CITI and can be accessed below.

Please follow this guidance to create a profile and add the course:

1. [CITI Registration Guide](#)
2. Link to CITI: <https://www.citiprogram.org/index.cfm?pageID=14>

PHS Agencies/ Agencies that Adopted PHS Policy:

## [FDP Institutional Clearinghouse](#)

## NSF POLICY

The [National Science Foundation Conflict of Interest Policies](#) require principal investigators and key personnel to disclose any significant financial interests *related to the research project* with the intent of identifying and mitigating potential researcher bias.

## Disclosure Requirement

Principal Investigators and key personnel are required to submit a disclosure statement prior to proposal submission and every year during the life of the grant or contract, unless disclosure is triggered by another event prior to an annual disclosure.

## [NSF Disclosure Form](#)