

**California State University Channel Islands**  
**Disclosure of Financial Interests Related to Projects Sponsored by**  
**PHS, NSF, or other Agencies Adopting the Federal Requirements**

*In accordance with CSU Channel Islands Policy on Principal Investigator Financial Conflict of Interest, 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 and specifically to the project itself. 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.*

Principal Investigator: Name, Last \_\_\_\_\_ First \_\_\_\_\_ MI \_\_\_\_\_  
Department \_\_\_\_\_ Project Begin Date \_\_\_\_\_  
Project End Date \_\_\_\_\_  
Proposal/Project Title: \_\_\_\_\_

Sponsor: \_\_\_\_\_

This submission is for: \_\_\_\_\_

Check box if CSUCI is serving as a subaward on this award. Please indicate lead institution: \_\_\_\_\_

**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 CSU Channel Islands 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.)**

**C. Non-CI Investigators:** Will Non-CI 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, CSU Channel Islands 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 CSU Channel Islands FCOI policy.

**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. Therefore, I recommend that funds be expended.

\_\_\_\_\_  
Signature of Scott Perez, Director of Research and Sponsored Programs

\_\_\_\_\_  
Date

Investigator's Disclosure of Financial Interests Addendum (complete if applicable)

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?	No	Yes	
Do you hold an equity position of 5% or more in the entity?	No	Yes	
Are you a director, officer, partner, trustee or employee of the entity? <i>If "yes," please specify below</i>	No	Yes	
Do you have intellectual property rights (patents, copyrights) being used by the entity or "interest"? <i>If "yes," please specify below</i>	No	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>	No	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>	No	Yes	
Purpose of trip	Sponsor/organizer	Destination	Duration

**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 CI's Senior Research Officer 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 Authorized Institutional Official and the CI COI Committee to 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, 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 CI's Senior Research Officer 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 CSU Channel Islands or the CSU Channel Islands Foundation (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 Senior Research Officer 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

The Senior Research Officer will review the disclosure information to ensure completeness and consistency and review whether potential conflict(s) of interest are disclosed. If related significant financial interests are disclosed, Investigators will complete an Addendum to provide additional information for review by the Senior Research Officer, and possibly (if it is determined the conflict may affect the funded research) a Conflict of Interest Oversight Committee. The Conflict of Interest Oversight Committee will consider whether the financial interests of the Investigator or the Entity could be directly and significantly affected by the proposed sponsored project and whether the financial interest could directly and significantly affect the design, conduct, or reporting of the project. A direct impact occurs when the project results would be directly relevant to the development, manufacturing, or improvement of the products or services of the entity in which the Investigator has a financial interest, or when the entity is a proposed subcontractor or participant in the project. A significant impact on the financial interest is one that will materially affect the value of the organization, its earnings, or the sale of its products. The Senior Research Officer will work with the PI and the Conflict of Interest Committee to develop a Conflict of Interest Resolution Plan and notify the sponsoring agency of the potential conflict and planned resolution.

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.