

San Francisco State University
Disclosure of Financial Interests Related to Projects Sponsored by
PHS, NSF, or other Agency Adopting the Federal Requirements
Project Cover Sheet

Completion of this form is mandatory for all Investigators who submit proposals to the National Science Foundation (NSF), the Public Health Service (PHS), or other sponsors that have adopted the federal requirements for financial disclosure. This information is required to comply with the San Francisco State University Financial Conflict of Interest Policy and federal regulations regarding disclosure of any financial interests that would reasonably appear to be affected by the conduct of a sponsored project. The information contained in this form may be released or transmitted to the sponsor, including federal agency representatives, and according to the California Public Records Act, it may also be released to the public, upon request.

Principal Investigator Last Name _____ First Name _____ MI _____

Department _____ Project Beginning and End Date _____

Proposal/Project Title _____

Amount of funding requested _____

Sponsor:

- PHS
- NSF
- Subcontract of PHS/NSF funds from _____
- Other _____

The submission is for (check one):

- New Proposal
- Annual Reporting / Non-Competing Continuation
- Competing Continuation (Renewal)
- New Investigator Added to Project
- Change in Financial Interest

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 conflict of interest identified via this disclosure. The investigator agrees to comply with any conditions or restrictions imposed by SFSU to manage, reduce, or eliminate actual or potential conflicts of interest or forfeit the award.

A. Principal Investigator certifies that this form provides (1) a complete disclosure of all individuals involved in the design, conduct, or reporting of activities associated with this project, and (2) a complete disclosure of PI's significant financial interests related to this project.

Do you, your spouse or dependent children have any significant financial interests related to the work to be conducted as part of the above-referenced project? (Reference definitions are on the reverse side of this form.)

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

Signature of Investigator Date

Name and Title of Principal Investigator (Please type or print)

B. Co-Investigator(s) certifies that this form provides (1) a complete disclosure of all individuals involved in the design, conduct, or reporting of activities associated with this project, and (2) a complete disclosure of PI's significant financial interests related to this project.

Do you, your spouse or dependent children have any significant financial interests related to the work to be conducted as part of the above-referenced project? (Reference definitions are on the reverse side of this form.)

1. No Yes, Co-Investigator's Disclosure of Economic Interests Addendum is attached in a sealed envelope.
(Please type or print information.)

Signature of Co-Investigator Date

Name and Title of Co-Investigator (Please type or print)
(Attach additional sheets as required to identify and include financial disclosure information for all Co-Investigators.)

C. Non-CSU Investigators: Will Non-CSU Investigators be involved with the PI or Co-PI, 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 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.

Authorized Representative 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.

Authorized Representative, Office of Research and Sponsored Programs Date

**San Francisco State University
Investigator Disclosure of Economic Interests Addendum**

I have reportable financial interests declared on the attached _____ pages.

Name of Interest:

Address of Interest:

Owners of Interest:

Type of Business:

Do you have an investment of \$10,000 or more in the entity?

Do you hold an equity position of 5% or more in the entity?

Are you a director, officer, partner, trustee or employee?

Do you have intellectual property rights (patents, copyrights) being used by the entity or "Interest"?

Is there an agreement between you and the entity or "Interest" for deferred remuneration, compensation, or financial gain of any kind?

I declare under penalty of perjury under the laws of the State of California that I have used all reasonable diligence in preparing this Disclosure and that, to the best of my knowledge and belief, it is true and complete.

Signature

Date

Instructions

For PHS and NSF:

1. The Principal Investigator (PI) and each Investigator must sign the Disclosure as early as possible after the PI is informed that federal funding is likely.
2. Investigators having a significant related financial interest must also complete the **Investigator's Disclosure of Economic Interests Addendum**. Allow sufficient time for the Chancellor's Office to complete a review, if necessary, and make a recommendation to the Executive Vice Chancellors of Academic Affairs and Business and Finance prior to 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.

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 the CO Sponsored Projects Administration Office (SPA) with the complete proposal package.
2. Investigators having a significant related financial interest must also complete the Investigator's Disclosure of Economic Interests Addendum. Allow sufficient time for the Chancellor's Office to complete a review, if necessary, and make a recommendation to the Executive Vice Chancellors of Academic Affairs and Business and Finance prior to award acceptance.

Definitions

Who Must Disclose? An individual involved in the design, conduct, or reporting of the results of work performed or to be performed under the sponsored project. "Investigator" includes, but is not limited to the Principal Investigator, Co-Investigators, and any other individuals (including personnel from other institutions) who are involved in accomplishing project objectives. It may 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 (or \$5,000 for PHS projects), (current market value) or a 5% 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 Trustees.

Financial Interest does **not** include (1) payments made by The Trustees (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 Oversight Committee will provide an assessment for the Vice Chancellors for Academic Affairs and Business and Finance 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

Staff in Sponsored Projects Administration Office and Systemwide Human Resources will review the disclosure information to ensure completeness and consistency with prior disclosures. Information provided in the Disclosures of those Investigators having a Related, Significant Financial Interest and additional appropriate documentation shall be forwarded to the Chancellor's Office Conflict of Interest Oversight Committee (COIOC). The COIOC 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 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 employee 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 COIOC will review the information and make a recommendation to the Executive Vice Chancellors for Academic Affairs and Business and Finance, who are the responsible institutional officials.

Retention of Information: Three (3) years after termination of sponsored project or until resolution of any action by the sponsor, whichever is greater. The Office of Record is the Office of Systemwide Human Resources.