



Financial Conflict of Interest Certification Procedure

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POLICY BACKGROUND

SF State requires Principal Investigators (PIs) and Key Personnel on a sponsored project to disclose a listing of significant financial interests (and those of their spouse and dependent children) that could be reasonably expected to bias the design, conduct, or reporting of the project. All PIs, Co-PIs and Key Personnel listed in a proposal for external funding must complete a disclosure form before expenses can be charged to an award.

PROCEDURE

Proposal Stage

The PI must complete one of the following forms before a proposal can be submitted and a copy of the completed form is retained in the proposal folder:

- *San Francisco State University's Disclosure of Financial Interests Certification Form*
- *California Form 700-U*

When the Award/Contract is Issued

1. When the PI is issued a new award they must complete the *PI Acceptance of Responsibility* online certification form, which asks the PI to verify there are no additional financial interests to disclose since proposal submission. If the PI indicates they have additional disclosures to report, the Compliance Unit will follow-up to collect a signed, updated version of the appropriate Financial Conflict of Interest (FCOI) form from the PI.
2. The Compliance Unit makes note of any identified FCOIs
3. The Associate Vice President for Research and Sponsored Programs reviews the signed *Disclosure of Financial Interests Certification* form, but not the *California Form 700-U*, and assesses the potential for a FCOI for each project and PI. If necessary, the Associate Vice President for Research and Sponsored Programs will develop resolution strategies with the PI to manage, reduce, or eliminate the FCOI.

Ongoing Monitoring

The Compliance Unit ensures that Conflict of Interest documentation is complete, current, and appropriate to the funding source, for each ORSP project. PIs are required to complete and submit FCOI forms:

1. Annually, during the period of the award
2. Within 30 days of discovering or acquiring a new FCOI

Additional Requirements for Direct Awards or Subcontracts from the PHS (NIH)

1. When a new award is received that is funded by the PHS (NIH), either directly or as a subcontract, a copy of the "Notice of New Award" email (generated via an online form) is sent to the Compliance Unit so they can add the project to their list of projects needing to adhere to the federal FCOI requirement.
2. Compliance informs the PI they need to attend an in-person FCOI training specifically related to those funds, and that they need to complete an online training course. The in-person and online trainings are good for four years unless there is a policy revision, new investigator, or an instance of non-compliance.
3. Compliance Unit monitors the PI's attendance of the in-person trainings and completion of the online training program. Compliance Unit prints a certification form from the training website for verification.
4. Subrecipients of PHS funds (when SF State is the prime recipient) certify adherence to their institution's FCOI policy, or agree to adhere to SF State's FCOI policy, on the *Subrecipient Commitment Form* submitted before the Subrecipient Agreement is issued.