



California State University Chancellor's Office  
Investigator's Disclosure of Economic Interests Addendum

I have reportable financial interests declared on the attached  pages

Name of Interest:

Address of Interest:

Owner(s) of Interest:

Principal Type of Business:

Do you have an investment of \$10,000 or more in the entity?  No  Yes

*For PHS-funded Investigators, do you have an investment of \$5,000 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?  No  Yes  
*If "yes," please specify below*

Do you have intellectual property rights (patents, copyrights) being used by the entity or "interest"?  No  Yes  
*If "yes," please specify below*

Is there an agreement between you and the entity or "interest" for deferred remuneration, compensation, or financial gain of any kind? *If "yes," please specify below*  No  Yes

For PHS-funded Investigators, do 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.  No  Yes  
*If "yes," please indicate purpose of trip, sponsor/organizer, destination, and duration below*

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.

Investigator's Signature

Date

Investigator's printed name

## 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.