

Financial Conflict of Interest Certification Procedure

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BACKGROUND

San Francisco State (SF State) requires Principal Investigators (PIs) and if required 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 and if required Co-PIs and Key Personnel must complete a disclosure form.

PROCEDURES

Pre-award/Proposal

The PI and if required Key Personnel must complete one of the Financial Conflict of Interest (FCOI) forms listed below during pre-award/proposal stage:

- Governmental Funder (e.g., federal, state, and local)
San Francisco State University's Disclosure of Financial Interests Certification Form
- Non-Governmental Funder (e.g., profit and non-profit)
California Form 700-U (Statement of Economic Interests For Principal Investigators)

The Associate Vice President for Research and Sponsored Programs or his/her designee reviews the signed FCOI form and assesses the potential for a FCOI for each project and PI/Key Personnel. If necessary, the Associate Vice President for Research and Sponsored Programs will develop resolution strategies with the PI/Key Personnel to manage, reduce, or eliminate the FCOI.

The FCOI form needs to be uploaded to the Pre-Award database by GA/GSC.

Post-award

When the PI is issued a new award, the PI and, if required, Key Personnel, must complete a FCOI form during the post-award stage.

The Associate Vice President for Research and Sponsored Programs or his/her designee reviews the signed FCOI form and assesses the potential for a FCOI for each project and PI/Key Personnel. If necessary, the Associate Vice President for Research and Sponsored Programs will develop resolution strategies with the PI/Key Personnel to manage, reduce, or eliminate the FCOI.

The FCOI form needs to be uploaded to the Pre-Award database by GA/GSC. The signed FCOI form needs to be submitted to ORSP Compliance Unit. Upon receipt, ORSP Compliance Unit will handle the COI form according to established policy and procedure and assign COI training for PI/Key Personnel if and when needed.

Ongoing Monitoring

PI/Key Personnel are required to complete and submit FCOI forms:

1. Within 30 days of acquiring or discovering a new FCOI for federal awards
2. Annually
 - federal awards: Compliance Unit handles the annual COI certification
 - non-governmental: Per CSU HR 2015-05 memo, annual COI certification not required. Renewal of award requires COI certification filed within 30 days (GA to handle)
3. COI Training (Compliance Unit monitors and notifies PI/Key Personnel to re-take training prior to expiration)