
**Policy and Procedures for Dealing with Conflict of
Interest in Research and Scholarly Activity**

In the area of conflict of financial interest or conflict of commitment, there are several sets of policies that apply to faculty and staff of California State University, Dominguez Hills (CSUDH). Officials and employees designated in the state's Conflict of Interest Code must comply with the policies governing the California Statement of Economic Interests. In addition, CSUDH upholds California State University system and institutional standards for outside professional activities in which its faculty and staff may become engaged. Information regarding system-wide policy on employment outside of the CSU is contained in Article 35 of the (1998) Unit 3 Collective Bargaining Agreement. CSUDH institutional policy with regard to outside consulting is framed as follows in the Faculty Handbook, section C:

Consultation within her/his professional field is recognized as a legitimate activity for a faculty member of the University. Non-curricular activities of that nature should tend to improve and broaden the knowledge of the individual so engaged and bring prestige to the individual and the University. Private consulting service is proper for a member of the faculty to accept, but should not conflict with the performance of assigned academic duties.

In all private consulting engagements, the client must be informed that the faculty member is acting as a private consultant and that the University is in no way a party to the contract. No official University stationery or forms shall be used in connection with such work, nor shall the name of the University be used in advertising. It is strongly urged that all employment outside the University by full-time members of the staff, other than that performed on an occasional basis only, be reported to the chairperson of the department and the dean of the school. Any questions on consulting services and incompatible activities should be discussed with the instructional dean of the school.

The above statements deal primarily with potential conflict of commitment or of educational mission. In keeping with Federal guidelines governing ethical practices in funded research and related scholarly activity, the following additional requirements related to financial interests apply:

CSUDH Policy

Each investigator must disclose to the Vice President for Academic Affairs or a designee all significant financial interests of the investigator (including those

of the investigator's spouse and dependent children) that would reasonably appear to be affected by the research or educational activities funded or proposed for external funding. In this connection, the term **'investigator'** means the principal investigator, co-principal investigator(s), and any other person at the institution who is responsible for the design, conduct, or reporting of the research or educational activities funded or proposed for funding. **'Significant financial interest'** means anything of monetary value, including, but not limited to, salary or other payments for services (e.g., consulting fees or honoraria), equity interest (e.g., stocks, stock options, or other ownership interests); and intellectual property rights (e.g., patents, copyrights, and royalties from the rights). **Excluded from consideration are the following:**

1. Salary, royalties or other remuneration from the applicant institution;
2. Income from seminars, lectures, or teaching engagements sponsored by public or non-profit entities;
3. Income from service on advisory committees or review panels for public or non-profit entities;
4. An equity interest that, when aggregated for the investigator and the investigator's spouse and dependent children, does not exceed \$10,000 in value as determined through reference to public prices or other reasonable measures of fair market value, and does not represent more than 5% ownership interest in any single entity;
5. Salary, royalties, or other payments that, when aggregated for the investigator and the investigator's spouse and dependent children, are not expected to exceed \$10,000 during the twelve-month period.

Outside activities unrelated to university responsibilities and undertaken by faculty or staff members on personal time, regardless of whether compensated, are not subject to the above policies, unless the individual, while on personal time, engages in outside activities which create a potential conflict of financial interest.

A financial disclosure, if required under the definition above, must be provided at the time a proposal is submitted for external funding and updated annually, or more frequently if new reportable significant financial interests arise.

Procedures

For activities that create a potential conflict of interest, the individual(s) must file a written disclosure containing the following information:

Name, department, and contract information;
Type of work or consulting to be provided;
Nature of the relationship in question;
Point of potential conflict of interest;
Short-or long-term commitment of time and effort to be devoted to the outside project;

Expected benefits to the outside entity, to the CSUDH employee, and to CSUDH;

Nature of any financial arrangements pertaining to compensation, including equity ownership and other forms of economic value provided to the university employee or any immediate member of the employee's family.

This disclosure should be filed with the Office of Research and Funded Projects (ORFP) from where it will be forwarded to the Vice President for Academic Affairs. The Vice President for Academic Affairs, in consultation with the Associate Vice President for Faculty Affairs and the Director of ORFP, shall determine whether a conflict of interest exists. A conflict exists when the reviewers reasonable conclude that a financial interest could potentially directly and significantly affect the design, conduct, or reporting of funded research. If such a determination is made, the reviewers will stipulate conditions or restrictions, if any, that should be imposed by the institution to manage, reduce, or eliminate the potential conflict. A management plan might include one or more of the following strategies:

- Public disclosure of significant financial interests;
- Monitoring of research or scholarly activity by independent reviewers;
- Modification of the research plan;
- Disqualification from participation in the portion of research that would be affected by the significant financial interests;
- Divestiture of significant financial interests;
- Addition of a co-investigator who has no financial interest that would compromise the project;
- Termination or withdrawal of the proposed project.

If the reviewer(s) determine that imposing conditions or restrictions would be either ineffective or inequitable, and the potential negative impacts that might arise from the significant financial interest are outweighed by the interests of scientific progress, technology transfer, or the public health and welfare, then the reviewer(s) may allow the project to go forward without imposing conditions or restrictions.

The investigator shall be informed of the decision with respect to his or her disclosure within ten (10) working days of its receipt.

If an investigator refuses or neglects to adhere to a suggested management plan, the university will withdraw the proposal from the outside funding agency and will officially notify the funding agency's general counsel of the institution's inability to manage the conflict satisfactorily.

The Office of the Vice President for Academic Affairs shall maintain files of financial disclosures and all actions taken to resolve conflicts of interest for at least three years beyond the termination or completion of the grant to which they relate or until the resolution of any funding agency action involving those records, whichever is longer.

**CALIFORNIA STATE UNIVERSITY, DOMINGUEZ HILLS
CONFLICT OF INTEREST DISCLOSURE FORM**

Investigator's name:

Department/College:

Project Title:

Proposed Funding Agency:

**I am disclosing the following significant financial interests related to the funding for this project.
(Responses should include the investigator, his/her spouse, and any dependent children.)**

Name of Entity:

Address of Entity:

Principal Type of Business:

If Entity is the funding agency, amount of funding request: \$

Are you a director, officer, partner, trustee or employee of the entity? Yes No

Have you received or do you expect to receive in the next 12 months salary, consulting fees and/or other payments in excess of \$10,000 from this entity? Yes No

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

