



<b>Guidance on</b>	Compendium Of Conflict Of Interest And Integrity Policies – Guidance
<b>Related Policy:</b>	Formerly Business and Finance Bulletin G-39
<b>Effective Date:</b>	May 22, 2018

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## **Compendium Of Conflict Of Interest And Integrity Policies – Guidance (formerly Business and Finance Bulletin G-39)**

### **Fundamental Expectations**

The Regents has adopted Standards of Ethical Conduct to express the University's "commitment to the ethical conduct of all University activities" and as a "statement of our belief in ethical, legal and professional behavior in all of our dealings inside and outside the University." University of California Regents Policy 1111. The standards include expectations that University community members avoid conflicts of interest and conflicts of commitment:

Employee members of the University community are expected to devote primary professional allegiance to the University and to the mission of teaching, research and public service. Outside employment must not interfere with University duties. Outside professional activities, personal financial interests, or acceptance of benefits from third parties can create actual or perceived conflicts between the University's mission and an individual's private interests. University community members who have certain professional or financial interests are expected to disclose them in compliance with applicable conflict of interest/conflict of commitment policies. In all matters, community members are expected to take appropriate steps, including consultation if issues are unclear, to avoid both conflicts of interest and the appearance of such conflicts. Standard 6, id.

To carry out the intent of the Regents, the University has adopted a number of conflict of interest and related policies in the many areas of its mission. This document was formerly Business and Finance Bulletin G-39, which was a collection of existing University policies related to conflict of interest. BFG G-39 was not a policy by itself. This Guidance maintains the same general format of the former G-39 and is also only a

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collection of existing University policies related to conflict of interest. Where a summary of a policy in this document and the actual text of the policy are inconsistent or where there is ambiguity, the actual text of the policy governs.

### **University Policies Only**

This Guidance contains only *University policies*; it does not include all the possible state or federal laws that may be applicable in any given situation. For example, transactions or arrangements involving UC Health entities and private parties may raise significant legal issues in other additional areas, including 1) federal and state anti-kickback laws; 2) the federal physician self-referral statute (commonly known as the “Stark Law”); and 3) antitrust laws, all of which are beyond the scope of this document. Another example is the law restricting the University’s participation in ballot campaigns. See the Appendix for other useful guidance.

This Compendium does not include local policies issued by the campuses. One should also check local campus policies, if any, regarding conflict of interest.

This Guidance does not constitute legal advice. Contact Campus Counsel or Office of General Counsel for legal advice.

Compendium Of Conflict Of Interest And Integrity Policies – Guidance

I. FINANCIAL CONFLICTS GENERALLY APPLICABLE TO ALL PRACTICE AREAS	A ALL FACULTY OR OTHER ACADEMIC APPOINTEES	B ALL STAFF EMPLOYEES	C EMPLOYEES WITH PROCUREMENT OR CONTRACTING RESPONSIBILITY	D MEMBERS OF SENIOR MANAGEMENT GROUP
1. <a href="#">Regents Policy 1111: Policy on Statement of Ethical Values and Standards of Ethical Conduct</a> (March 16, 2017). <a href="#">Summary</a>	✓	✓	✓	✓
2. <a href="#">Regents Policy 1110: Policy on Conflicts of Interest in Accordance with the Political Reform Act</a> (For Regents Only) (March 16, 2017) <a href="#">Summary</a>				
3. University of California <a href="#">Conflict of Interest Code</a> (Financial) (October 2014). See also related guidance in the Appendix, attached. <a href="#">Summary</a>	✓	✓	✓	✓
4. <a href="#">Personnel Policies for Staff Members (PPSM) 82</a> , Conflict of Interest (July 14, 2016). <a href="#">Summary</a>		✓	✓	✓
5. <a href="#">Senior Management Group Outside Professional Activities</a> (July 21, 2016) <a href="#">Summary</a>				✓
6. Personnel Policy for Staff Members <a href="#">21 – Selection and Appointment</a> , Section F. Employment of Near Relatives (January 1, 2018). <a href="#">Summary</a>		✓	✓	✓

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<b>II. CONFLICT OF COMMITMENT</b>	<b>A FACULTY OR OTHER ACADEMIC APPOINTEES</b>	<b>B ALL STAFF EMPLOYEES</b>	<b>C EMPLOYEES WITH PROCUREMENT OR CONTRACTING RESPONSIBILITY</b>	<b>D MEMBERS OF SENIOR MANAGEMENT GROUP</b>
1. <a href="#">Standing Order 103.1(b)</a> of The Regents of the University of California, Special Provisions Concerning Officers, Faculty Members, and Employees of the University, Service Obligations (April 18, 1969). <a href="#">Summary</a>	✓	✓	✓	✓
2. Policy on Conflict of Commitment and Outside Activities of Faculty Members (July 1, 2014), <a href="#">Academic Personnel Manual Section 025</a> . <a href="#">Summary</a>	✓			
3. Regents Policy 7707, <a href="#">Senior Management Group Outside Professional Activities</a> (January 21, 2010) <a href="#">Summary</a>				✓
4. Academic Personnel Manual Section 671 - <a href="#">Conflict of Commitment and Outside Activities of Health Sciences Compensation Plan Participants</a> , (July 1, 2014). <a href="#">Summary</a>	✓			

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<b>III. PROCUREMENT, PURCHASING GOODS AND SERVICES, AUDITING</b>	<b>A FACULTY OR OTHER ACADEMIC APPOINTEES</b>	<b>B ALL STAFF EMPLOYEES</b>	<b>C EMPLOYEES WITH PROCUREMENT OR CONTRACTING RESPONSIBILITY</b>	<b>D MEMBERS OF SENIOR MANAGEMENT GROUP</b>
1. Material Management, <a href="#">BFB-BUS-43</a> (November 17, 2017) <a href="#">Summary</a>	✓	✓	✓	✓
a. III, Part 3: Purchase Transactions, Section J. Personal Purchases b. III. Part 5, Employee – Supplier Relationship (including Near Relatives)	✓ ✓	✓ ✓	✓ ✓	✓ ✓
2. <a href="#">Health Care Vendor Relations Policy</a> (March 12, 2008) <a href="#">Summary</a>	✓	✓	✓	✓

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IV. USE OF UNIVERSITY PROPERTY, FACILITIES, AND E-MAIL	A FACULTY OR OTHER ACADEMIC APPOINTEES	B ALL STAFF EMPLOYEES	C EMPLOYEES WITH PROCUREMENT OR CONTRACTING RESPONSIBILITY	D MEMBERS OF SENIOR MANAGEMENT GROUP
1. Policies Applying to Campus Activities, Organizations, and Students, Section 40.00, <a href="#">Policy on Use of University Properties</a> . (September 25, 2006) <a href="#">Summary</a>	✓	✓	✓	✓
2. Management and Control of University Equipment, <a href="#">BFB-BUS-29</a> , Section III.M – Personal Use of Property. (July 1, 2007) <a href="#">Summary</a>	✓	✓	✓	✓
3. Office of the President, <a href="#">Electronic Communications Policy</a> (August 18, 2005) <a href="#">Summary</a>	✓	✓	✓	✓
4. <a href="#">Policy on Representation of the University on Letterhead and Business Cards</a> (September 28, 1999) <a href="#">Summary</a>	✓	✓	✓	✓
5. <a href="#">Guidelines for the Purchase and Use of Cellular Phones and Other Portable Electronic Resources</a> , BFB-G-46 (March 30, 2012) <a href="#">Summary</a>	✓	✓	✓	✓

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V. ACADEMIC PERSONNEL POLICY - MISCELLANEOUS	A FACULTY OR OTHER ACADEMIC APPOINTEES	B ALL STAFF EMPLOYEES	C EMPLOYEES WITH PROCUREMENT OR CONTRACTING RESPONSIBILITY	D MEMBERS OF SENIOR MANAGEMENT GROUP
1. Privileges and Duties of Members of the Faculty, <a href="#">Academic Personnel Manual (APM) Section 005</a> , Paragraph 3. (February 13, 1935) <a href="#">Summary</a>	✓			
2. Policy on Academic Freedom, <a href="#">Academic Personnel Manual Section 010</a> . (September 29, 2009) <a href="#">Summary</a>	✓			
3. Academic Personnel Manual <a href="#">Section 015, The Faculty Code of Conduct (July 1, 2017)</a> <a href="#">Summary</a>	✓			
4. Academic Personnel Manual <a href="#">Section 016, University Policy on Faculty Conduct and the Administration of Discipline</a> (July 1, 2017) <a href="#">Summary</a>	✓			
5. Special Services to Individuals and Organizations, University Regulation No. 4 (June 3, 1958), and Principles Underlying Regulation No. 4 (June 23, 1958), <a href="#">Academic Personnel Manual Section 020</a> . <a href="#">Summary</a>	✓			
6. Policy on Additional Compensation for Services as Faculty Consultant <a href="#">Academic Personnel Manual Section 664</a> . (July 1, 2014) <a href="#">Summary</a>	✓			
7. Policy on Employment of Near Relatives, <a href="#">Academic Personnel Manual Section 520</a> (October 1, 2009) <a href="#">Summary</a>	✓			
8. Policy on Conflict of Commitment and Outside Professional Activities for Deans, Academic Personnel Manual <a href="#">Section 240</a> (January 1, 2010) <a href="#">Summary</a>	✓			
9. <a href="#">Health Sciences Compensation Plan</a> , APM – 670 (July 2, 2012) <a href="#">Summary</a>	✓			

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VI. INVENTIONS, PATENTS AND LICENSING	A FACULTY OR OTHER ACADEMIC APPOINTEES	B STAFF EMPLOYEES (RESEARCH)	C ALL STAFF EMPLOYEES	D EMPLOYEES WITH PROCUREMENT OR CONTRACTING RESPONSIBILITY	E MEMBERS OF SENIOR MANAGEMENT GROUP
1. University of California <a href="#">Patent Policy</a> (November 18, 1985; October 1, 1997) <a href="#">Summary</a>	✓	✓	✓	✓	✓
2. <a href="#">Guidelines on Accepting and Managing Equity When Licensing University Technology G-44</a> (February 15, 2002) <a href="#">Summary</a>	✓	✓		✓	
3. <a href="#">University Policy on Accepting Equity When Licensing University Technology</a> (June 18, 2008) <a href="#">Summary</a>	✓	✓		✓	
4. <a href="#">Managing Potential Conflicts of Interest in Licensing OTT-01-02</a> (August 1, 2001). <a href="#">Summary</a> a. Office of Technology Transfer Operating Guidance 01-02 - <a href="#">Managing Potential Conflicts of Interest in Licensing Under the California Political Reform Act</a> (August 1, 2001) <a href="#">Summary</a> b. Office of Technology Transfer Operating Guidance 01-02 ( <a href="#">Supplement 1</a> ) - Managing Potential Conflicts of Interest in Licensing Under the California Political Reform Act (October 11, 2001). <a href="#">Summary</a>	✓ ✓ ✓	✓ ✓ ✓		✓ ✓ ✓	
5. Office of Research & Graduate Studies, Research Policy Analysis Coordination, Operating Guidance 12-02, <a href="#">University Licensing Guidelines</a> (February 1, 2012)	✓	✓		✓	



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V. RESEARCH	A FACULTY OR OTHER ACADEMIC APPOINTEES	B STAFF EMPLOYEES (RESEARCH)	C ALL STAFF EMPLOYEES	D EMPLOYEES WITH PROCUREMENT OR CONTRACTING RESPONSIBILITY	E MEMBERS OF SENIOR MANAGEMENT GROUP
1. <a href="#">Policy on Disclosure of Financial Interest in Private Sponsors of Research and Guidelines</a> (April 29, 2010), Academic Personnel Manual Section 028. <a href="#">Summary</a>	✓				
2. <a href="#">Policy on Disclosure of Financial Interests and Management of Conflicts of Interest Related to Sponsored Projects</a> (March 4, 2010) (As of August 24, 2012, no longer applies to research funded by Public Health Service Awards – see #5, listed below). <a href="#">Summary</a>	✓	✓			
3. <a href="#">Policy on the Requirement to Submit Proposals and to Receive Awards for Grants and Contracts through the University</a> (December 14, 1994) <a href="#">Summary</a>	✓	✓			
4. University <a href="#">Policy on Integrity in Research</a> (June 19, 1990). <a href="#">Summary</a>	✓	✓			
5. <a href="#">Disclosure of Financial Interests &amp; Management of Conflicts of Interest, Public Health Service Research Awards</a> (August 23, 2012) <a href="#">Summary</a>	✓	✓			
6. <a href="#">Disclosure of Financial Interests and Management of Conflicts of Interest, National Science Foundation Awards</a> (December 23, 2014) <a href="#">Summary</a>	✓	✓			
7. Office of Research and Graduate Studies, Research Policy Analysis Coordination, Operating Guidance 11-05, <a href="#">Summary Statement of Principles and Policies on Institutional Conflict of Interest in Research</a> (June 1, 2011) <a href="#">Summary</a>	✓	✓			
8. Office of Research and Graduate Studies, Research Policy Analysis Coordination Memo Operating Guidance 11-04, <a href="#">Financial Interest Disclosure in the Research Consent Form</a> (June 1, 2011) <a href="#">Summary</a>	✓	✓			
9. <a href="#">Research Grants Programs Office, Conflict of Interest and Professional Activities Policy</a> (January 2013) <a href="#">Summary</a>	✓	✓			

## **I. FINANCIAL CONFLICTS GENERALLY – APPLICABLE TO ALL PRACTICE AREAS**

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### 1. Standards of Ethical Conduct

Summary: Sets forth general standards for fair dealing; individual responsibility and accountability; respect for others; compliance with applicable laws and regulations; compliance with applicable university policies, procedures and other forms of guidance; conflicts of interest or commitment; ethical conduct of research; records: confidentiality/privacy and access; internal controls; use of university resources; financial reporting; reporting violations and protection from retaliation.

### 2. Policy on Conflicts of Interest in Accordance with the Political Reform Act

Summary: Regents shall complete conflict of interest training, submit an annual certification and alert the General Counsel of possible financial conflicts of interest. Also sets forth recusal procedure and disqualification expectation.

### 3. University of California Conflict of Interest Code

Summary: Requires public filing of financial disclosure statements (i.e., Form 700) by “designated” officials, and prohibits these individuals from accepting certain honoraria and gifts. Disqualifies from University decision-making any employee who has a financial interest in that decision. Programmatic teaching and research decisions are not considered University decisions under the Code. Research decisions pertaining to research projects funded in whole or in part by private entities are subject to separate Code and policy requirements. (See Policy on Disclosure of Financial Interest in Private Sponsors of Research, APM - 028.)

### 4. Personnel Policies for Staff Members, Policy 82 - Conflict of Interest.

Summary: Prohibits an employee from engaging in any activities that create a conflict of interest between the employee’s assigned functions and any other interest or obligation.

### 5. Senior Management Group Outside Professional Activities

Summary: Codifies and clarifies the principle that Senior Management Group (SMG) members’ professional activities are beneficial to the University, so long as the primary commitment of employees remains the fulfillment of regular University responsibilities. A SMG member must get approval in advance for both compensated and uncompensated outside professional activities. Up to two concurrent compensated activities (e.g., board memberships, consulting or advisory activity) are permitted. Explains the requirement for annual reporting of such activities to the President and the Regents.

6. Personnel Policy for Staff Members 21 – Selection and Appointment, Section F – Employment of Near Relatives.

Summary: Permits the appointment of near relatives in the same department, only when in the best interests of the University. An employee may not participate in the process of reviewing or decision-making on any matter concerning the appointment, promotion, salary, retention, termination, or other management or personnel related decisions regarding a near relative.

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## **II. CONFLICT OF COMMITMENT**

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1. Standing Order 103.1(b) of The Regents of the University of California, Special Provisions Concerning Officers, Faculty Members, and Employees of the University, Service Obligations.

Summary: Prohibits any time due the University from being devoted to private purposes and establishes that no outside employment shall interfere with the performance of University duties.

2. Academic Personnel Manual Section 025, Conflict of Commitment and Outside Activities of Faculty Members.

Summary: Provides guidance for the identification and management of outside professional activities in order to avoid conflicts of commitment, while assuring that faculty (see APM - 025-14-a for a list of faculty titles subject to this policy) may engage in a wide array of outside activities without unnecessary limitations.

3. Senior Management Group Outside Professional Activities

Summary: Codifies and clarifies the principle that Senior Management Group (SMG) members' professional activities are beneficial to the University, so long as the primary commitment of employees remains the fulfillment of regular University responsibilities. A SMG member must get approval in advance for both compensated and uncompensated outside professional activities. Up to two concurrent compensated activities (e.g., board memberships, consulting or advisory activity) are permitted. Explains the requirement for annual reporting of such activities to the President and the Regents.

4. Academic Personnel Manual Section 671, Conflict of Commitment and Outside Activities of Health Sciences Compensation Plan Participants

Summary: Provides guidance for the identification, management and annual reporting of outside professional activities for the disposition of income earned from outside professional activities for Health Science Compensation Plan participating faculty.

### **III. PROCUREMENT, PURCHASING GOODS AND SERVICES, AUDITING**

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1. Material Management, Business and Finance Bulletin BUS-43, Purchases of Goods and Services; Supply Chain Management

III, Part 1: Purchase Transactions, Section J, Personal Purchases

Summary: Generally prohibits the use of University credit, purchasing power, facilities, and services to make personal purchases of goods or services or for non-University activities.

III, Part 5: Employee-Supplier Relationships

Summary: Sets forth limitations and requirements covering acquisition of goods or services when the transaction involves an employee-supplier relationship, as opposed to an employer-employee relationship.

2. UC Health Care Vendor Relations Policy

Summary: Applies to members of the UC community who work, train, or are students at health care locations or in health professional schools (e.g., medicine, dentistry, nursing, pharmacy, optometry, veterinary medicine). Prohibits gifts from Health Care Vendors to Health Care Individuals; sets out additional rules governing gifts and compensation provided by vendors; interaction between health care vendors and UC personnel; responsibilities of committees that oversee purchasing decisions; vendor preceptorships; references the Federal Anti-Kickback Statute (which prohibits knowing and willful solicitation or receipt, offer, or payment of remuneration in return for patient, product or service referrals or to induce such referrals that could potentially be reimbursed by Medicare or any state health program).

3. Ethical Professional Conduct: Internal Audit Code of Ethics.

Summary: Requires University internal auditors to adhere to the University of California's "Code of Ethics for Members of the Internal Audit Departments" and to the Institute of Internal Auditor's "Code of Ethics," which defines standards of ethical conduct, including avoidance of conflicts of interest.

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### **IV. USE OF UNIVERSITY PROPERTY, FACILITIES, AND E-MAIL**

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1. Policies Applying to Campus Activities, Organizations, and Students, Section 40.00: Policy on Use of University Properties.

Summary: All individuals or organizations using University properties and services must avoid any unauthorized implication that they are sponsored, endorsed, or favored by the University. The name, insignia, seal, or address (including the electronic address) of the University or any of its offices or units shall not be used for or in connection with religious,

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political, business or other purposes or activities except as consistent with University policy, campus implementing regulations, and applicable law. Campus implementing regulations may adopt restrictions, consistent with existing law and University policy, on the use of University properties for commercial purposes and personal financial gain.

2. Management and Control of University Equipment, Business and Finance Bulletin BUS - 29, Section N - Personal Use of Property.

Summary: Prohibits University employees from using University materiel or property in the care and custody of the University for personal purposes, except with the approval of the Chancellor or Laboratory Director.

3. Office of the President, Electronic Communications Policy.

Summary: Sets forth restrictions on use of University electronic communications resources including unlawful activities, commercial purposes not under the auspices of the University, personal financial gain, personal use inconsistent with policy, and other uses that violate other University or campus policies or guidelines.

4. Policy on Representation of the University on Letterhead and Business Cards

Summary: Restricts the use of the University's name and seal to purposes that are in keeping with the mission of the University.

5. Guidelines for the Purchase and Use of Cellular Phones and Other Portable Electronic Resources, BFB-G-46

Summary: Provides for permitted use of University provided cellular devices, computers, and peripheral equipment by employees outside of the workplace.

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## **V. ACADEMIC PERSONNEL POLICY - MISCELLANEOUS**

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1. Privileges and Duties of Members of the Faculty, University Regulation No. 3, Academic Personnel Manual Section 005, Paragraph 3a.

Summary: Assumes that a faculty member devotes full "working" time to the University. Such service includes classroom teaching, conference with students, studying and writing, research, committee work, administration, and public service.

2. Policy on Academic Freedom, Academic Personnel Manual Section 010.

Summary: The principles of academic freedom protect freedom of inquiry and research, freedom of teaching, and freedom of expression and publication. Academic freedom requires that teaching and scholarship be assessed by reference to the professional standards that sustain the University's pursuit and achievement of knowledge.

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3. Academic Personnel Manual Section 015, The Faculty Code of Conduct and Academic Personnel Manual Section 016, University Policy on Faculty Conduct and the Administration of Discipline.

Summary: Faculty "give due regard to their paramount responsibilities within their institution in determining the amount and character of the work done outside it." "Unauthorized use of University resources or facilities on a significant scale for personal, commercial, political, or religious purposes" is unacceptable conduct, and APM 016 contains sanctions that may be applied when misconduct is substantiated by a formal process.

4. Special Services to Individuals and Organizations, University Regulation No. 4, and Principles Underlying Regulation No. 4, Academic Personnel Manual Section 020.

Summary: Allows faculty to render professional or scholarly services for compensation and may engage in the practice of their professions to maintain professional competency: (1) if such service does not interfere with University commitments and if it gives experience and knowledge of value to his or her teaching or research; (2) if it is suitable research through which the individual may make worthy contributions to knowledge; and/or (3) if it is appropriate public service. When consultations or outside services are such as to interfere with recognized University duties, they may be undertaken only on the basis of a leave of absence, without University salary, for the period involved. University laboratories, bureaus, and facilities are not to be used for work of a purely commercial character except when it can be shown conclusively that satisfactory facilities for such services do not exist elsewhere.

5. Policy on Additional Compensation for Services as Faculty Consultant, Academic Personnel Manual Section 664.

Summary: If not regularly engaged on the project concerned, allows faculty, on occasion, to receive additional compensation for consultant services on projects conducted under the auspices of the University.

6. Academic Personnel Manual Section 520, Employment of Near Relatives.

Summary: Permits the appointment of near relatives in the same department when authorized under specified circumstances.

7. Academic Personnel Manual, Section 240, Deans

Summary: Permits deans to engage in outside activities in accordance with APM - 025, Conflict of Commitment and Outside Activities of Faculty Members, with additional provisions limiting compensated for-profit external board service, and use of accrued vacation leave to engage in compensated outside professional leaves in excess of twelve days per fiscal year. Compensated outside professional activities must be reported annually to the Chancellor.

8. Academic Personnel Manual Section 670, Health Sciences Compensation Plan.

Summary: Describes the type of income that may be retained by plan members.

## **VI. INVENTIONS, PATENTS AND LICENSING**

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1. University of California Patent Policy.

Summary: Sets forth specific requirements for the discoveries and inventions of University faculty, employees, and others associated with the University, including an obligation to "promptly report and fully disclose the conception and/or reduction to practice of potentially patentable inventions" and to "assign inventions and patents to the University" under most circumstances.

2. Guidelines on Accepting and Managing Equity When Licensing University Technology G-44

Summary: Sets forth the procedures for University's acceptance of equity in a company to facilitate the practical application of a University invention for the general public benefit when that company is able to bring the invention to the marketplace. Includes conflict of interest considerations.

3. University Policy on Accepting Equity When Licensing University Technology (June 18, 2008).

Summary: Permits the acceptance of equity in a company as partial consideration for receiving a license. The principles set forth in the Policy establish parameters for entering into such arrangements.

4. Managing Potential Conflicts of Interest in Licensing Under the California Political Reform Act.

Summary: Provides for intervening licensing decision review by a disinterested official or committee if an inventor or author participates in or influences University licensing decisions and has a disqualifying personal financial interest in those decisions as defined in the California Political Reform Act. Addresses some of the most common issues concerning potential conflicts of interest in University licensing activity.

5. Office of Research & Graduate Studies, RPAC Operating Guidance 12-02, University Licensing Guidelines, Paragraph 9.

Summary: Requires that all decisions made about licensing University inventions be based upon legitimate institutional academic and business considerations and not upon matters related to personal financial gain.

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## **VII. RESEARCH**

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1. Academic Personnel Manual Section 028, Disclosure of Financial Interest in Private Sponsors of Research and Guidelines.

Summary: Along with state regulations mandated by the Fair Political Practices Commission under the Political Reform Act (2 Cal. Code of Regs. § 18702.4(c)), requires that a principal investigator must disclose whether or not he or she has a direct or indirect financial interest in the sponsor of

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research when it is funded in whole or in part by a non- governmental entity.

2. University of California Policy on Disclosure of Financial Interests and Management of Conflicts of Interest Related to Sponsored Projects.

Summary: Establishes a process of disclosure and independent review when an Investigator has significant personal financial interest(s) related to a sponsored project that might reasonably appear to be directly and significantly affected by the sponsored project. The policy applies to research projects sponsored by the U.S. Public Health Service, including Institutes of Health, and the National Science Foundation, and specified that the University may elect to apply the disclosure requirements to certain University-managed programs or may expand the application of this Policy to other extramural sponsors if required by those sponsors. However, as of August 23, 2012, the Policy no longer applies to research funded by Public Health Service Awards (with respect to such research, it has been superseded by the University of California Policy on Disclosure of Financial Interests & Management of Conflicts of Interest, Public Health Service Research Awards (August 23, 2012) (See #5, below).

3. Policy on the Requirement to Submit Proposals and to Receive Awards for Grants and Contracts through the University.

Summary: Requires that employees submit proposals for extramural support through the appropriate local contracts and grants office. Awards must be made to The Regents.

4. University Policy on Integrity in Research.

Summary: Reaffirms the University's commitment to integrity in research and calls for local guidelines and procedures for addressing allegations of misconduct in research.

5. Policy on Disclosure of Financial Interests & Management of Conflicts of Interest, Public Health Service Research Awards.

Summary: Requires investigators seeking or receiving research support from PHS (including NIH) to disclose to their designated campus official all Significant Financial Interests (SFI) related to their Institutional Responsibilities. Requires designated officials to determine whether any disclosed SFI is related to an Investigator's PHS-funded research and whether it constitutes a Financial Conflict of Interest reportable under PHS regulations.

6. Disclosure of Financial Interests and Management of Conflicts of Interest, National Science Foundation Awards

Summary: Implements the National Science Foundation's Investigator Financial Interest Policy. Applies to research projects and educational activities sponsored by the National Science Foundation (NSF) and to other sponsors that adopt the NSF policy. It also applies to certain University-



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managed programs, if application of the policy is approved by the Vice President for Research and Graduate Studies. Identifies and manages potential conflicts to assure the objectivity with which projects are designed, conducted or reported. This policy is not directed toward the disclosure of financial interests of the Investigator in an individual sponsor. Rather, this Policy is directed toward disclosure of any significant personal financial interests which exceed the threshold for disclosure and that would reasonably appear to be affected by the work performed under a sponsored project.

### 7. Research Policy Analysis Coordination Memo Operating Guidance 11-05, Summary Statement of Principles and Policies on Institutional Conflict of Interest in Research

Summary: Summarizes University of California's principles, policies and measures with regard to institutional conflict of interest in research. An institutional conflict of interest in research may arise when a financial interest of the institution compromises or biases or appears to compromise or bias: 1) the design, conduct, or reporting of the research being funded; or 2) the design, conduct or reporting of other research being or to be conducted by the campus or by the University. A conflict may also arise when the resources of the campus or University are utilized for research in a way that is incongruent with the mission, obligations, or values of the institution and that is for financial gain.

### 8. Research Policy Analysis Coordination Memo Operating Guidance 11-04, Financial Interest Disclosure in the Research Consent Form

Summary: Provides guidance for disclosure of investigator and institutional financial interests in human subject research.

### 9. Research Grants Programs Office, Conflict of Interest and Professional Activities Policy

Summary: Set forth the conflict of interest policy applicable to Research Grants Program Office employees, contractors, reviewers, and advisors who are involved in developing recommendations for and making decisions about grant funding and grant management. Discusses outside professional activities, annual disclosure, financial conflict of interest, other interests, gifts and honoraria, and fundraising activities.

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## VIII. REVISION HISTORY

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**May 22, 2018:** This guideline is replacing the BFB-G-39 of the same topic.

This guideline was also remediated to meet Web Content Accessibility Guidelines (WCAG) 2.0.

## **IX. APPENDIX**

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Other useful guidance.

[Acceptance of Personal Gifts and Gratuities by Employees Under California's Political Reform Act](#)

[Introduction to the Disqualification Rule of the California Political Reform Act \(January 2014\).](#)

[Legal guidelines for UC participation in ballot campaigns.](#)

List of [Campus Academic Conflict of Interest Coordinators](#)

List of [Campus Conflict of Interest Coordinators](#)