

# Compliance

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**If you have questions, please contact the COI team**

[COI@research.ucsb.edu](mailto:COI@research.ucsb.edu)

**Nancy Lewis**

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GENERAL UNIVERSITY POLICY REGARDING  
ACADEMIC APPOINTEES  
Conflict of Commitment and Outside Activities of Faculty Members

APM - 025

025-0 **Policy**

The University of California policy on conflict of commitment and outside activities of faculty members is set forth in the following pages.

025-2 **Purpose**

This policy affirms faculty responsibilities as members of the University of California and provides mechanisms to ensure that activities outside the University do not interfere with fulfillment of these responsibilities. This policy addresses compensated and uncompensated outside professional and non-professional activities. It provides specific guidelines designed to address potential conflicts of commitment arising when a faculty member wishes to undertake compensated outside professional activities. It also provides general guidance for: i) addressing potential conflicts of commitment for uncompensated outside professional activities; ii) addressing compensated and uncompensated outside non-professional activities; and iii) involving students in the outside professional activities of faculty.

This policy reinforces other University policies (listed in Appendix A). It does not replace professional and health science school policies which provide more detailed or specific guidelines on outside activities. Health sciences faculty who are members of a compensation plan may only retain professional income in accordance with the terms of the compensation plan.

This policy applies to full-time and part-time faculty members (as defined at APM - 110-4(14)). The term "faculty" includes, but is not limited to, all members of the Academic Senate and equivalent ranks, as defined in Regents' Standing Order 105.1 and Bylaw 55 of the Academic Senate. However, this policy does not apply to emeritus faculty members unless an emeritus faculty member is on recall status. In addition, this policy applies to all academic or other administrators who hold academic appointments in a faculty title series regardless of the current percentage of time related to the academic appointment. Academic administrators may also be subject to additional approval and reporting requirements as set forth in the University Policy and Guidelines on Outside Professional Activities for Officers and Designated Staff.

025-4 **Definitions**

*Compensation* is defined as income, assets, or capital, either realized or having the potential to become realized.

*Outside Professional Activities* are defined as those activities that are within a faculty member's area of professional, academic expertise and that advance or communicate that expertise through interaction with industry, the community, or the public, and through consulting or professional opportunities.

*Outside Non-Professional Activities* are defined as activities that are not directly related to a faculty member's area of professional, academic expertise and that take place outside the University context.

An *Academic-Year Appointment* is an appointment in which the individual renders services to the University during the academic year, from the beginning of the fall term through the end of the spring term (APM - 600-4-d), or the equivalent of an academic year should the campus operate year-round.

A *Fiscal-Year Appointment* is an appointment in which the individual renders service to the University throughout the calendar year as opposed to the academic year. Fiscal-year appointees accrue vacation time in accordance with APM - 730.

A *Day* is defined on a case-by-case basis, using common sense and customary practice. The University recognizes and supports a framework of diverse hours and schedules to accommodate teaching, research and creative work activity, University service, and University-related public service. Accordingly, these guidelines do not provide a strict definition of a day. Faculty members and department chairs or other appropriate administrators should exercise sound professional judgment, taking into account reasonable work schedules, when determining what constitutes a day of outside activity. Upon request from the Chancellor or his or her designee(s), faculty members should be prepared to provide an explanation of the definition of "day" used in preparing the prior approval and disclosure form or the annual report form (see APM - 025-20).

025-6 **General Principles**

In joining the University faculty, scholars accept as their own the University's responsibilities to advance and communicate knowledge. For purposes of advancement and promotion, the performance of faculty members in fulfilling their University obligations is evaluated by grouping their activities into four

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interrelated categories: teaching, research and creative work activity, professional competence and activity, and University or University-related public service. Whether professional or non-professional, compensated or uncompensated, an outside activity that interferes with successful performance of the faculty member's University obligations represents a conflict of commitment.

Teaching and research or creative work activity are clearly the primary activities of the faculty and receive the largest commitment of effort and energy. A faculty member is obligated to have a significant presence on campus, to meet classes, to keep office hours, to hold examinations as scheduled, to be accessible to students and staff, to be available to interact with University colleagues, and to share service responsibilities throughout every quarter or semester of active duty.

Faculty members are also expected to participate in University activities and to use their professional expertise to contribute to their professions and to the community. University activities and outside professional activities can be positive contributors to fulfilling one's University obligations. The University sees great value in activities outside the University that advance and communicate knowledge through interaction with industry, the community, and the public, and through consulting and professional opportunities.

Regents' Standing Order 103.1(b) states that faculty members shall not allow outside employment to interfere with primary University duties. Pertinent provisions of Regulation No. 4 (Special Services to Individuals and Organizations, APM - 020) implement the Standing Order and reinforce the concept that outside professional activities may be a valuable contribution to the University and to an individual's professional growth so long as the activities are undertaken in a manner consistent with the full performance of the faculty member's primary University obligations. Because compensated outside professional activity may raise the appearance, or the reality, of a conflict of commitment to the faculty member's University obligations, the University has established specific guidelines for managing such activity. These guidelines are presented in APM - 025-10, and mechanisms for managing them are presented in APM - 025-20. The University recognizes that uncompensated outside professional activities and compensated and uncompensated outside non-professional activities may on occasion also present the appearance, or the reality, of a conflict of commitment. General guidance for addressing such circumstances is presented in APM - 025-30 and 025-40, respectively. The University also recognizes that faculty members may draw upon their professional, academic expertise in the context of their personal lives (e.g., an architect redesigning his or her home, an economist managing his or her investments) and that such activity may result in compensation, under the definition used in this policy. If activities such as these should present the

appearance or the reality of a conflict of commitment, they should be handled in a manner similar to that for compensated and uncompensated outside non-professional activities (APM - 025-40). General guidance for involving students in outside professional activities is provided in APM - 025-50.

A faculty member may pursue compensated and uncompensated, professional and non-professional activities, adhering to the principles and guidelines described herein. If the faculty member anticipates that any such outside activity would interfere with performance of University duties and responsibilities, then under certain circumstances the University may grant the faculty member a leave to pursue the activity. Leaves for this purpose must be reviewed annually and are normally allowable for a maximum of two years, subject to approval of an exception by the Chancellor.

#### 025-10 **Guidelines for Compensated Outside Professional Activities**

##### a. **General**

These guidelines affirm principles and guidelines stated in the Faculty Code of Conduct (APM - 015), the criteria for appointment in the Professor series (APM - 220), and the criteria for review of merit and promotion (APM - 210). As stated in APM - 015, Section II – The Faculty Code of Conduct, the role of the faculty and administration in assuring sound professional action and judgment is as follows:

The University seeks to provide and sustain an environment conducive to sharing, extending, and critically examining knowledge and values, and to furthering the search for wisdom. Effective performance of these central functions requires that faculty members be free within their respective fields of competence to pursue and teach the truth in accord with appropriate standards of scholarly inquiry.

The faculty's privileges and protections, including that of tenure, rest on the mutually supportive relationships between the faculty's special professional competence, its academic freedom, and the central functions of the University. These relationships are also the source of the professional responsibilities of faculty members. (Preamble)

In support of the University's central functions as an institution of higher learning, a major responsibility of the Administration is to

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protect and encourage the faculty in its teaching, learning, research, and public service. (Part I, Professional Rights of Faculty)

Professors, guided by a deep conviction of the worth and dignity of the advancement of knowledge, recognize the special responsibilities placed upon them. Their primary responsibility to their subject is to seek and to state the truth as they see it. To this end professors devote their energies to developing and improving their scholarly competence. They accept the obligation to exercise critical self-discipline and judgment in using, extending, and transmitting knowledge. They practice intellectual honesty. Although professors may follow subsidiary interests, these interests must never seriously hamper or compromise their freedom of inquiry. (AAUP Statement, 1966; Revised, 1987) (Part II.B, Scholarship)

Professors give due regard to their paramount responsibilities within their institution in determining the amount and character of the work done outside it. (Part II.C, The University)

While fulfilling his or her University obligations, a faculty member may pursue compensated outside professional activities that advance or communicate knowledge through interaction with industry, the community, or the public, and through consulting or professional opportunities. Such activities give the individual experience and knowledge valuable to teaching, research, and creative work activity and/or provide a University-related public service.

Compensated outside professional activities are the ones most likely to cause real or apparent conflicts of commitment. For this reason, the University has established guidelines on the amount of time allowed for such activities and identified three categories of compensated outside professional activities that vary in the extent to which they may raise conflict of commitment issues. Accordingly, compensated outside professional activities which fall into these different categories have different requirements as to prior approval, inclusion in the time limit, and annual reporting.

**b. Time Limits on Compensated Outside Professional Activities**

The following time limits apply to each fiscal year. Allowable days not used one year may not be carried forward to the next year.

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A full-time faculty member on an academic-year appointment normally may engage in compensated outside professional activities for up to 39 days from the start of the fall term through the end of the spring term (including inter-session), or during the equivalent of an academic year if the campus is operating on a year-round schedule. There are no restrictions on the number of days of compensated outside professional activity for academic-year faculty during the summer months (or equivalent term, if on a year-round schedule) unless an academic-year faculty member is receiving University compensation for the summer (or equivalent term). If an academic-year faculty member is receiving University summer (or equivalent term) compensation, then the applicable limit on compensated outside professional activities is the equivalent of one day per week during the period in which compensation is received.

A full-time faculty member on a fiscal-year appointment may engage in compensated outside professional activities for up to 48 days during the months of active service. There are no restrictions on the number of days of compensated outside professional activity during the periods of vacation leave (unless the faculty member is earning additional University compensation during the vacation leave).

For part-time faculty (i.e., those with less than a full-time appointment), the applicable time limit is prorated based on their percentage appointment at the University. In addition, compensated outside professional activity conducted during the remaining percentage of time is at the faculty member's discretion. For example, a 50 percent academic year appointee would be allowed 19.5 days ( $39 \times .50$ ) during the academic year, some or all of which could be conducted during the faculty member's normal University working hours provided that the faculty member had otherwise fulfilled his or her obligations to the University. In addition, the faculty member could engage in additional compensated outside professional activities during the time not committed to the University.

The Chancellor may approve in writing compensated outside professional activities which exceed these time limits for an individual faculty member, or a group of faculty, when in the Chancellor's opinion the activity benefits the University.

**c. Categories of Compensated Outside Professional Activities**

Compensated outside professional activities are divided into three categories in terms of the extent to which they may raise conflict of commitment issues.



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For each category, there are different requirements as to prior approval, inclusion in the time limit, and annual reporting. Each of the categories and the related requirements are described below.

- (1) **Category I** activities are likely on their face to raise issues of conflict of commitment. In order to engage in such activities while an active member of the faculty, the faculty member must make a written request (see APM - 025, Appendix B) to the Chancellor or Chancellor's designee(s) and receive written approval. Requests must be submitted and approved annually, unless approved for a longer term, which may not exceed five years. Prior approval does not affect the scope of annual reports of professional activities. If permitted, Category I activities are counted within the 39/48-day time limit and must be reported annually (see APM - 025, Appendix C). Category I activities include the following:

Assuming an executive or managerial position in a for-profit or not-for-profit business, which is generally not allowable. For purposes of this policy, executive or managerial positions do not include: a) serving on the board of directors of an outside entity, or b) providing consulting services or engaging in professional practice through the faculty member's single member professional corporation or sole proprietorship. Also, providing professional services through a more complex type of organization, in which the role of the faculty member might potentially be classified as executive or managerial, is ordinarily allowable in disciplines where the Chancellor has determined that professional practice is generally accepted as being integral to faculty work (e.g., in architecture or law). In such disciplines, multi-year approvals, which may not exceed a five year term, are appropriate.

Administering a grant outside the University that would ordinarily be conducted under the auspices of the University, which is generally not allowable (see the Policy on the Requirement to Submit Proposals and to Receive Awards for Grants and Contracts through the University (12/15/94)).

Establishing a relationship as a salaried employee outside the University. In addition, with the exception of delivering occasional lectures or participating in UC-sponsored continuing education programs, compensated teaching or research at another institution while employed as a full-time faculty member at the University is

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not permitted without prior written approval of only the Chancellor or Executive Vice Chancellor.

Engaging in other compensated outside professional activities which common sense and good judgment would indicate are likely to raise issues of conflict of commitment.

- (2) **Category II** activities are unlikely to raise issues of conflict of commitment and are ordinarily accepted as regularly performed compensated outside professional activities. Because of this, they are ordinarily allowable without prior approval. Category II activities are counted within the 39/48-day time limit and must be reported annually (see APM - 025, Appendix C). Examples of Category II activities include the following:

Providing expert testimony in administrative, legislative, or judicial proceedings.

Providing consulting services or referrals or engaging in professional practice where such activities are provided by the faculty member acting as an individual or are provided by the faculty member through his or her single member professional corporation or sole proprietorship. Providing such services through other types of organizations or arrangements (e.g., through a publicly held corporation) requires prior approval in accordance with APM - 025-10-c(1).

Serving on the board of directors of an outside entity.

Providing a workshop for industry.

Undertaking compensated outside professional activity not mentioned in Categories I or III and that common sense and good judgment indicate are not likely to raise issues of conflict of commitment.

In addition, in accordance with APM - 662, faculty members may receive additional compensation for specified additional University teaching activities (i.e., UNEX courses and programs, other continuing education programs run by the University, and self-supporting UC degree programs), and these activities are also reportable and counted within the 39/48-day limit.

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- (3) **Category III** activities are integral to all disciplines and ordinarily do not present issues of conflict of commitment. They are accepted as part of the faculty member's scholarly and creative work. Even if compensated, they are allowable and not counted within the 39/48-day limit. Category III activities do not need to be reported annually; however, the Chancellor or his or her designee(s) may under certain circumstances ask for information about them (see Additional Relevant Information, APM - 025-20-c). Examples of Category III activities include the following:

Serving on a federal, state, or local government agency, committee, panel, or commission.

Acting in an editorial capacity for a professional journal.

Reviewing journal manuscripts, book manuscripts, or grant or contract proposals.

Attending and presenting talks at scholarly colloquia and conferences.

Developing scholarly communications in the form of books or journal articles, movies, television productions, and similar works, even when such activities result in financial gain.

Serving as a committee member or as an officer of a professional or scholarly society.

Accepting a commission for an artistic work or performance that is considered an integral part of a faculty member's academic portfolio (e.g., a work of art or a dance performance).

Accepting honoraria (other than those received for Category II activities) and prizes.

**025-20 Managing Compensated Outside Professional Activities**

Campuses are charged with implementing the procedures necessary to properly manage compensated outside professional activities. Integral to these procedures are mechanisms for requesting and receiving approval for Category I activities and for reporting Category I and II activities.

a. **Prior Approval**

No Category I activity may be undertaken without prior written approval by the Chancellor or Chancellor's designee(s) of a written request by the faculty member. The form for requesting and obtaining approval for Category I activities is provided in APM - 025, Appendix B.

The Chancellor or Chancellor's designee is responsible for retaining, in accordance with records retention schedules, copies of all requests and approvals (or denials) for Category I activities.

b. **Annual Reports**

To assist in the documentation and recording of a faculty member's compensated outside professional activities, an annual report including all Category I and II activities must be filed with the Chancellor or his or her designee(s) at the end of each fiscal year (June 30), listing the nature and extent of Category I and II compensated outside professional activities conducted during that academic or fiscal year, depending on the faculty member's appointment. In addition, faculty with academic-year appointments must report Category I and II activities for summer months during which they earn additional University compensation. The annual report is acknowledged by signature of the Chancellor or his or her designee(s). Faculty members may, at their discretion, include this report or other evidence of outside activities in their review file or dossier.

The annual report shall consist of a general description of the business, agency, organization, group, or individual(s) for which service was performed, a description of the type of service performed during the period of the academic appointment, a description of the role the faculty member assumed for an outside business, agency, organization, group, or individual(s), and the number of days spent in each activity during the academic or fiscal year, depending on the faculty member's appointment. In addition, the Chancellor or his or her designee(s) may request, and faculty shall be obligated to provide, a verbal identification of the entity(ies) or person(s) to whom the faculty member provided services. APM - 025, Appendix C includes the form for the annual report.

c. **Additional Relevant Information**

If the department Chair or other official designated by the Chancellor has any concern about whether a faculty member is meeting the standards of this

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policy, he or she will discuss this with the faculty member and may seek additional relevant information. If a satisfactory resolution cannot be reached, the appropriate Dean or Provost will be advised of the problem and of the specific steps that have been taken in attempting to resolve the issue. Further attempts at resolution shall follow the University Policy on Faculty Conduct and other applicable regulations.

**025-30 Guidance for Uncompensated Outside Professional Activities**

While fulfilling University obligations, faculty members may from time to time pursue uncompensated outside professional activities as defined in this policy. Uncompensated outside professional activities may advance or communicate knowledge through interaction with industry, the community, and the public, and through consulting and professional opportunities without generating income. However, such endeavors must not interfere with a faculty member's full-time commitment to the University. If the department Chair, the Dean or other official designated by the Chancellor believes that a faculty member is failing to meet his or her University obligation due to uncompensated outside professional activities or that the faculty member has undertaken uncompensated outside professional activities which create a possible conflict of commitment, then the Chancellor's designee may use the guidelines for compensated outside professional activities as a model to address the possible conflicts of commitment.

**025-40 Guidance for Compensated and Uncompensated Outside Non-Professional Activities**

While fulfilling University obligations, faculty members may from time to time pursue sustained outside non-professional activities, as defined in this policy. Outside non-professional activities are part of the faculty member's private life and are not expressly governed by University regulations or by the guidelines on outside professional activities. However, such endeavors must not interfere with a faculty member's full-time commitment to the University, and it is possible that concerns may arise under rare circumstances such as when an avocation becomes a vocation. If the Chair, the Dean or other official designated by the Chancellor, believes that a faculty member is failing to meet his or her University obligation due to outside non-professional activities or has undertaken outside non-professional activities which create a possible conflict of commitment, then the Chancellor's designee(s) may use the guidelines for compensated outside professional activities as a model to address possible conflicts of commitment. For example, if a concern arose that a faculty member's avocation was becoming a

vocation, the Chancellor's designee(s) would be guided to focus his or her discussions with the faculty member on the level of commitment or time required for the activity, rather than focusing on the amount of compensation earned or potentially realizable. If a satisfactory resolution could not be reached, the Chancellor's designee could apply the time limits for compensated outside professional activities to the non-professional activity that caused the concern. In such cases, both the time devoted to the non-professional activity that caused the concern and the time devoted to outside professional activities (compensated or uncompensated) would all be counted toward the time limits for compensated outside professional activities.

**025-50 Guidance for Involving Students in the Outside Professional Activities of Faculty**

Part-time involvement of students in the outside professional activities of a faculty member may, under certain conditions, offer the potential for substantial benefit to the education of the student. Before involving a student in an outside professional activity in which the faculty member has a financial interest, the faculty member must obtain prior written approval from the official designated by the Chancellor, with a copy to the Dean, after discussion with the department chair and the student. In this context, involvement means any substantive activity, whether paid or unpaid. If the faculty member has a role in supervising the student's thesis or in supervising the work of the student as a graduate teaching assistant, the faculty member must take care to avoid potential conflicts of interest in the evaluation of the student's performance.

If a faculty member is already associated with a student in outside professional activities and the faculty member has a financial interest in the activity, he or she must obtain the approval of the official designated by the Chancellor before becoming a research supervisor, academic program advisor, or examiner for an advanced degree for the student. Within a University research laboratory or academic unit, faculty members must take care not to favor or give the impression of favoritism to students with whom they are associated in outside activities.

**025-60 Grievances**

Faculty may grieve a decision made under this policy, including the decision to deny a request to engage in an outside activity (see Academic Senate Bylaw 335 and APM - 140 for academic personnel grievance policies).

**RELATED UNIVERSITY POLICIES**

- Standing Order of The Regents 103.1(b)
- University Regulation No. 3 (February 15, 1935) – Academic Personnel Manual Section 005
- University Regulation No. 4 (June 23, 1958, and amended November 16, 1960) – Academic Personnel Manual Section 020
- Faculty Code of Conduct (June 15, 1971, and amended May 30, 1974, and as further amended through June 19, 1992)
- University of California Policy on Disclosure of Financial Interests and Management of Conflicts of Interest Related to Sponsored Projects (10/6/97)
- Policy on Disclosure of Financial Interest in Private Sponsors of Research and Guidelines (April 26, 1984) – Academic Personnel Manual Section 028
- Conflict of Interest Code – Disqualification Requirement (May 1981)
- Health Sciences Compensation Plan and Guidelines on Occasional Outside Professional Activities by Health Sciences Compensation Plan Participants (11/23/99) – Academic Personnel Manual Section 670
- Cooperative Extension Administrative Handbook Section 356

**PRIOR APPROVAL  
FOR COMPENSATED OUTSIDE PROFESSIONAL ACTIVITIES (CATEGORY I) OR  
FOR INVOLVING STUDENTS IN OUTSIDE PROFESSIONAL ACTIVITIES**

Name \_\_\_\_\_ Position \_\_\_\_\_  
          Last           First           M.I.   Academic- or Fiscal-Year Appointment \_\_\_\_\_  
Department \_\_\_\_\_ College/School \_\_\_\_\_

For each Category I compensated outside professional activity in which you wish to engage or for involving students in outside professional activities in which you have a financial interest, answer the following questions. You may attach separate sheets, if necessary.

1. General description of the business/agency/organization/group/individual:  
\_\_\_\_\_
2. Activities/products/services of entity described in 1 above: \_\_\_\_\_
3. Nature of your relationship to entity named in 1 above (check all that apply):  
 Owner                            Consultant                            Stockholder/partnership interest  
 Board member                    Equity/royalty interest            Salaried employee  
 Other, please explain: \_\_\_\_\_
4. Type of activity in which you will be involved:  

<u>Category I Activities</u>	<u>Other Activity Requiring Approval</u>
<input type="checkbox"/> Executive/managerial role	<input type="checkbox"/> Involving students in outside activities
<input type="checkbox"/> Outside teaching or research activity	<input type="checkbox"/> in which you have a financial interest
<input type="checkbox"/> Salaried employee	
<input type="checkbox"/> Other potential conflict of commitment	
5. Description of the nature of your (or your student's) participation in this activity, including, if you wish, possible beneficial outcomes to areas of research, industry, and public service (or to your student's education):  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_
6. Beginning/ending month/year you could be involved in this activity: \_\_\_\_\_
7. Fiscal year(s) for which seeking approval: \* \_\_\_\_\_
8. Estimated number of days' involvement during academic or fiscal-year appointment: \_\_\_\_\_
9. Do you wish to take a full- or part-time leave while engaged in this activity? \_\_\_\_\_  

Approval granted through fiscal year ending June 30, \_\_\_\_\_  
 Request denied

\_\_\_\_\_  
Faculty Member Signature                   Date                   Chancellor or Chancellor's Designee                   Date

\* Note: Approvals are generally for one fiscal year, but may be granted for a longer term, not to exceed five years.



**REPORT OF CATEGORY I AND II COMPENSATED OUTSIDE PROFESSIONAL ACTIVITIES  
AND ADDITIONAL TEACHING ACTIVITIES  
FOR THE FISCAL YEAR ENDING JUNE 30, \_\_\_\_\_  
EXPLANATIONS FOR INFORMATION REQUESTED**

Compensated Outside Professional Activities: *Compensation* is defined as income, assets, or capital, realized or having the potential to become realized. *Outside Professional Activities* are defined as those activities that are within a faculty member's area of professional, academic expertise and that advance or communicate that expertise through interaction with industry, the community, or the public, and through consulting or professional opportunities.

Academic/Fiscal-Year Faculty Appointment: Enter whether you held an academic- or fiscal-year appointment. An *Academic-Year Appointment* is an appointment in which the faculty member renders services to the University during the academic year, from the beginning of the fall term through the end of the spring term (APM - 600-4-d), or the equivalent of an academic year should the campus operate year-round. A *Fiscal-Year Appointment* is an appointment in which the faculty member renders service to the University throughout the calendar year as opposed to the academic year. Fiscal-year faculty accrue vacation time in accordance with APM - 730. A full-time faculty member on an academic-year appointment normally may engage in compensated outside professional activities for up to 39 days from the start of the fall term through the end of the spring term (including intersession). There are no restrictions on the number of days of compensated outside professional activity for academic-year faculty during the summer months unless an academic-year faculty member is receiving University compensation for the summer. If an academic-year faculty member is receiving University summer compensation, then the applicable limit on compensated outside professional activities is the equivalent of one day per week during the period in which compensation is received. A fiscal-year faculty member is permitted a maximum of 48 days during the months of active service.

Terms of Leave, If Any: A faculty member may be permitted to go on full- or part-time leave in order to pursue certain compensated outside professional activities. If you were on such leave during any part of the pertinent fiscal year, provide information here about the percentage of time and inclusive months.

Category: For each activity, enter I, II or AT (for additional teaching as defined in APM-662). *Category I* activities include: assuming an executive or managerial position (which for purposes of this policy does not include (1) serving on a board of directors of an outside entity or (2) providing consulting services or engaging in professional practice through the faculty member's single member professional corporation or sole proprietorship); administering, outside of the University, a grant that would ordinarily be conducted under the auspices of the University; establishing an employment relationship as a salaried employee outside of the University; compensated teaching or research at another institution; and other activities which common sense and good judgement would indicate are likely to raise issues of conflict of commitment. You must receive prior approval to engage in Category I activities, which always count in the 39/48-day limit and must be reported annually. *Category II* activities include: providing expert testimony in administrative, legislative, or judicial proceedings; providing occasional professional consulting services or referrals or engaging in professional practice where such activities are provided by the faculty member acting as an individual or are provided by the faculty member through his or her single member professional corporation or sole proprietorship; and undertaking compensated outside professional activity not mentioned in Categories I or III (see APM - 025 for description of Category III activities which do not need to be reported). Category II activities are counted within the 39/48-day limit and must be reported annually. Note that, in accordance with APM - 662, faculty members may receive additional compensation for specified additional University teaching activities (i.e., UNEX courses and programs, other continuing education programs which are run by the University, and self-supporting UC degree programs) and that these activities are also reportable and counted within the 39/48-day limit.

# Days: Enter the approximate number of days you worked on this activity during your period of active service to the University. For compensated outside professional activities *Day* is defined on a case by case basis, using common sense and customary practice. The University recognizes and supports the diverse hours and schedules devised by faculty members and department chairs to accommodate teaching, research and creative work activity, University service, and University-related public service. You should exercise sound professional judgment, taking into account reasonable work schedules, when determining what constitutes a day of outside activity and be prepared to provide, upon request from the responsible University official, an explanation of the definition of "day" you used. For additional teaching activities, the general rule is that every six contact or "podium" hours spent with students equals one day. See APM - 662 for further information.

Description of Activity: Briefly describe the work you did.

Nature of Relationship: Use one or more of the following terms to describe your relationship to the entity identified in the last column, the one for whom you performed the compensated outside professional activity: owner, board member, consultant, equity or royalty interest, stockholder or partnership interest, salaried employee, or other (explain).

GENERAL UNIVERSITY POLICY REGARDING ACADEMIC APPOINTEES  
 Conflict of Commitment and Outside Activities of Faculty Members

APM - 025  
 APPENDIX C

**REPORT OF CATEGORY I and II COMPENSATED OUTSIDE PROFESSIONAL ACTIVITIES  
 AND ADDITIONAL TEACHING ACTIVITIES  
 FOR THE FISCAL YEAR ENDING JUNE 30, \_\_\_\_\_ (APM - 025)**

Instructions: In accord with APM - 025, this form must be filed each year by all faculty. Complete all parts of it for the time your academic- or fiscal-year appointment was effective during the identified fiscal year. See explanations for further guidance. If you engaged in no Category I and II compensated outside professional activities during the identified fiscal year and did not perform additional teaching as defined in APM - 662 (i.e., teaching in UNEX courses or programs, other continuing education programs run by the University, or self-supporting UC degree programs), write "NONE" across the grid below. The report for each fiscal year is due by November 1 of the following fiscal year.

Name \_\_\_\_\_ Academic Title \_\_\_\_\_

Appointment (circle one): Academic-year or Fiscal-year Department \_\_\_\_\_

Terms of leave, if any \_\_\_\_\_ College/School \_\_\_\_\_

Cate- gory	# Days	Description of Activity	Nature of Relationship	General Description of Business/Agency/ Organization/Group/Person

Faculty Member Signature \_\_\_\_\_ Date \_\_\_\_\_

Chancellor or Chancellor's Designee \_\_\_\_\_ Date \_\_\_\_\_

**UNIVERSITY OF CALIFORNIA, SANTA BARBARA  
OFFICE OF RESEARCH**

**SPONSORED PROJECTS POLICY**

**RESEARCH CIRCULAR D.1.**

**POLICY ON DISCLOSURE OF FINANCIAL INTERESTS  
UNDER FEDERAL DISCLOSURE POLICIES**

**I. References**

- A. University of California Policy on Disclosure of Financial Interests and Management of Conflicts of Interest Related to Sponsored Projects (effective October 1, 1995, revised October 15, 1997).
- B. Public Health Service (PHS) regulations, *Objectivity in Research*, 42 CFR Part 50 and 45 CFR Part 94.
- C. National Institutes of Health Grants Policy Statement (version at issue of policy: March, 2001).
- D. National Science Foundation (NSF) Grant Policy Manual, Section 510 (version at issue of policy: August 1, 2002).

**II. Policy**

A. General Statement

Any Investigator who has responsibility for the design, conduct, or reporting of a project sponsored by the National Science Foundation (NSF), Public Health Service (including NIH) and certain other agencies must disclose all Significant Financial Interests (see definition below) of the Investigator and his or her spouse and dependent children that may be related to or affected by the sponsored project. If the University determines that such an interest might reasonably appear to directly and significantly affect the sponsored project, then the Significant Financial Interest has created a conflict of interest. Under federal regulations, the University must take steps to either manage or eliminate conflicts of interest.

Additionally, proposals submitted to PHS, NSF and certain other agencies require an authorized institutional official to certify that financial interest disclosure requirements set forth in this policy have been met and that any conflict of interest will be satisfactorily managed or eliminated prior to the institution's expenditure of funds under the award. Certain agency regulations also require that all required financial disclosures under this policy are provided at the time that the proposal is submitted to the agency. Therefore, the University will not submit proposals to PHS, NSF or any other sponsor requiring adherence to the federal regulations or the 800-U disclosure process (which implements the federal regulations) unless all investigator(s) of the proposed project have signed a Disclosure of Financial Interests Under Federal Policies (Form 800-U) and submitted a Statement of Economic Interests: Addendum (Form 800-UA), if required. The University shall not release award funds until the 800-U forms, including any addenda (Form 800-UA) in the cases where a significant financial interest is identified, have been reviewed and any conflicts of interest have been managed or eliminated.

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The identification of financial interests under federal regulations is broader than the State of California Conflict of Interest Policy. While the state disclosure laws require disclosure of financial interest in the *individual sponsor*, the Federal regulations require disclosure of any financial interest that *may be affected by the work* performed under a sponsored project.

B. Definitions.

1. Investigator. An “investigator” includes any individual who has responsibility for the design, conduct, or reporting of the sponsored project (i.e., any University individual, including students).

2. Significant Financial Interest. A “Significant Financial Interest” is anything of monetary value including, but not limited to:

- (a) Income exceeding \$10,000 when aggregated for an Investigator and the Investigator’s spouse and dependent children from a single Entity (business, public or non-profit) including salary, consultant payments, honoraria, royalty payments, dividend, loan, or any other payments or consideration with value, including payments during the past 12 months and income expected to be received in the next 12 months. Income from a Public or Non-profit Entity for seminars, lectures, teaching engagement or service on advisory committees or review panels is exempt.
- (b) Equity in the form of stock, stock options, real estate, loan to, or any other investments or ownership interest exceeding \$10,000 (current market value) or a 5% ownership interest, for any one enterprise when aggregated for an Investigator, the Investigator’s spouse and dependent children.
- (c) 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,
- (d) 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 Regents.

A Significant Financial Interest does not include: (1) payments made by the Regents; (2) income from seminars, lectures or teaching engagements sponsored by a public or non-profit entity; or (3) income from service on advisory committees or review panels for public or non-profit entities.

3. “Related” Significant Financial Interest. A Significant Financial Interest is “related” to the sponsored project if:

- (a) 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 there is a financial interest;
- (b) 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;
- (c) The Investigator has consulting income from a single entity that exceeds \$10,000 during the prior twelve months, and the financial interests of that entity, or the

Investigator's financial interests related to consulting for that entity, would reasonably appear to be affected by the research.

- (d) 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 to make referral of participants to, or make purchases from, the entity; or,
- (e) The Investigator has a financial interest that is part of a consortium or that will otherwise participate in the sponsored project.

C. The Disclosure Process.

1. Initial Disclosure Documentation. All Investigators must complete and sign the Form 800-U (Disclosure of Financial Interests Under Federal Policies) before the University will submit the project proposal to the sponsoring agency. The Lead Principal Investigator is responsible for assuring that all Investigators are properly identified, and for assuring that each Investigator complete and submit the Form 800-U and any other required documentation to the Sponsored Projects Office for review. The Form 800-U should be submitted to the Sponsored Projects Office with the initial proposal review package.

2. Supplemental Disclosure Documentation. If a Significant Financial Interest is identified by any Investigator, that Investigator must also complete the Statement of Economic Interests: Addendum (Form 800-UA) and attach any supporting documentation requested by the Form. The Lead Principal Investigator is responsible for assuring that all Investigators who identify a Significant Financial Interest properly complete and submit Form 800-UA. The Form 800-UA should be submitted to the Sponsored Projects Office.

3. Review of Significant Financial Interests. All Significant Financial Interests must be subject to an independent substantive review prior to the acceptance of the funding at issue. The reviews shall be performed by the Conflict of Interest Committee, which recommends to the Vice Chancellor for Research whether the disclosed Significant Financial Interest might reasonably appear to directly and significantly affect the sponsored project and if so, whether the conflict of interest created by that Significant Financial Interest can be effectively managed or eliminated. The Vice Chancellor for Research must approve the acceptance of funds, and any conditions to be attached, before the funds can be accepted by the University. The Conflict of Interest Committee is appointed pursuant to Section III.A.2. of the Policy on Acceptance of Private Funds for Research. The Conflict of Interest Committee may require the submission of additional documents or information, or require the Investigator to appear before the Committee, if needed to make it's determination.

If the Conflict of Interest Committee determines that the conflict of interest cannot be satisfactorily managed or eliminated, the Vice Chancellor for Research shall notify the agency in accordance with the agency's policies and guidelines.

4. Management or Elimination of Conflict of Interest. The Conflict of Interest Committee may recommend that special conditions or restrictions be imposed to manage or eliminate an existing or potential conflict of interest. The goal in managing conflicts of interest is to minimize the effect of that interest on the design, conduct, or reporting of the sponsored project. Examples of conditions or restrictions that may be imposed include:

- 1. Public disclosure of the related financial interest
- 2. Monitoring of the project by independent reviewers.

3. Modification of the research or project plan
4. Disqualification of the Investigator from all or a portion of the project.
5. Divestiture of the financial interest
6. Severance of the relationship(s) that create actual or potential conflicts.

6. Updating Disclosure Information Disclosure information shall be updated whenever new or substantially increased Significant Financial Interests related to a project are acquired by an Investigator for which a prior disclosure form has been submitted--it is the responsibility of the individual Investigator to assure that a new form is completed promptly when a new or substantially increased Significant Financial Interest is created. Disclosures may also need to be updated when the Principal Investigator receives notification of a pending award. It is the responsibility of the Principal Investigator to assure that each Investigator of the project submits updates at this time. Reviews of updated disclosures will be completed by the Conflict of Interest Committee within sixty (60) days of receipt of the updated disclosure forms.

D. Sanctions Failure to file complete or updated disclosure forms, when applicable, or failure to comply with any conditions or restrictions imposed on the conduct of a sponsored project under this Policy, will be grounds for discipline pursuant to the Policy on Faculty Conduct and the Administration of Discipline or other applicable employee policies. In addition, Federal regulations may require reports to the Federal sponsor of any violations of University policy. Sponsors may suspend or terminate the award and/or debar an investigator from receiving future awards.

E. Record Retention Records regarding disclosures--, including the disclosure forms, COIC recommendations, and University actions--must be retained for three years beyond the termination or completion of an award for a sponsored project, or until resolution of any action by the sponsor involving the records, whichever is longer. Records related to unfunded projects need not be retained.

#### **IV. Attachments**

- A. Disclosure of Financial Interests Under Federal Policies (Form 800-U)
- B. Statement of Economic Interests: Addendum (Form 800-UA)

First Issued: September 15, 1995  
Last Revised: February 1, 2003, effective: February 15, 2003

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Steven Gaines  
Acting Vice Chancellor for Research

cc: Meta Clow, Administrative Services

# Instructions for Completing Form 700-U

CALIFORNIA  
FORM **700-U**

## Who Files Form 700-U?

This form must be filed by all persons employed by UC or CSU who have principal responsibility for a research project if the project is to be funded or supported, in whole or in part, by a contract or grant (or other funds earmarked by the donor for a specific research project or for a specific researcher) from a nongovernmental entity.

Reporting requirements are outlined in regulation 18755. This regulation provides that research funding by certain nonprofit entities will not trigger disclosure. This regulation is available on the FPPC website.

## What is an Investment?

"Investment" means any financial interest in a business entity in which you, your spouse or registered domestic partner, or your dependent children have a direct, indirect, or beneficial interest totaling \$2,000 or more. Reportable investments include stocks, bonds, warrants, and options, including those held in margin or brokerage accounts and investment funds. Common examples of investment funds are index funds, exchange-traded funds, and venture capital funds. (See Gov. Code section 82034.)

## What is Income?

"Income" means a payment received, including but not limited to any salary, wage, advance, dividend, interest, rent, proceeds from any sale, gift, including any gift of food or beverage, loan forgiveness or payment of indebtedness received by the filer, reimbursement for expenses, per diem, or contribution to an insurance or pension program paid by any person other than an employer, and any community property interest in income of a spouse or registered domestic partner. Income also includes an outstanding loan. Income of an individual also includes a pro rata share of any income of any business entity or trust in which the individual, spouse, or registered domestic partner owns directly, indirectly, or beneficially, a 10% interest or greater. Income includes your gross income and your community property interest in your spouse's or registered domestic partner's gross income totaling \$500 or more. Gross income is the total amount of income before deducting expenses, losses, or taxes. (See Gov. Code section 82030.)

## What is a Loan?

Loans received or outstanding are reportable if they total \$500 or more from a single lender. Your community property interest in loans received by your spouse or registered domestic partner also must be reported. (See Gov. Code section 82030(a).)

## What is a Gift?

A gift is anything of value for which you have not provided equal or greater consideration to the donor. A gift is reportable if its fair market value is \$50 or more. In addition, multiple gifts totaling \$50 or more received from a reportable source must be reported.

It is the acceptance of a gift, not the ultimate use to which it is put, that imposes your reporting obligation. Therefore you must report a gift even if you never used it or if you gave it away to another person.

If the exact amount of a gift is not known, you must make a good faith estimate of the item's fair market value. Listing the value of a gift as "over \$50" or "value unknown" is not adequate disclosure.

### Commonly reportable gifts include:

- Tickets/passes to sporting or entertainment events
- Tickets/passes to amusement parks
- Parking passes
- Food, beverages, and accommodations, including that provided in direct connection with your attendance at a convention, conference, meeting, social event, meal, or like gathering, where you did not give a speech, participate in a panel or seminar, or provide a similar service
- Rebates/discounts not made in the regular course of business to members of the public without regard to official status
- Wedding gifts
- An honorarium. You may report an honorarium as income rather than as a gift if you provided services of equal or greater value than the payment received.
- Transportation and lodging
- Forgiveness of a loan received by you

(See Gov. Code section 82028.)

**STATEMENT OF ECONOMIC INTERESTS**  
**FOR**  
**PRINCIPAL INVESTIGATORS**

Date Received \_\_\_\_\_  
 Campus Use Only

Campus: \_\_\_\_\_

ID No: \_\_\_\_\_

Please type or print in ink.

NAME (LAST)	(FIRST)	(MIDDLE)	TELEPHONE NUMBER ( )
ACADEMIC UNIT OR DEPARTMENT		MAIL CODE	E-MAIL ADDRESS
TITLE OF RESEARCH PROJECT			

**1. Information Regarding Funding Entity:**

(Use a separate Form 700-U for each funding entity.)

Name of Entity: \_\_\_\_\_

Address of Entity: \_\_\_\_\_

Principal Business of Entity: \_\_\_\_\_

Amount of Funding: \$ \_\_\_\_\_

Estimated  Actual

**2. Type of Statement** (Check at least one box)

Initial (for new funding)

Date of initial funding: \_\_\_\_/\_\_\_\_/\_\_\_\_

Interim (for renewed funding)

Funding was renewed on: \_\_\_\_/\_\_\_\_/\_\_\_\_

**3. Filer Information**

A. Are you a director, officer, partner, trustee, consultant, employee, or do you hold a position of management in the entity listed in Part 1? No  Yes

Title: \_\_\_\_\_

B. Do you, your spouse or registered domestic partner, or your dependent children have an investment of \$2,000 or more in the entity listed in Part 1 above? No  Yes  - value is:

\$2,000 - \$10,000       \$10,001 - \$100,000  
 \$100,001 - \$1,000,000       Exceeds \$1,000,000

If you have sold or divested yourself of investments:

Date Divested: \_\_\_\_/\_\_\_\_/\_\_\_\_

C. Have you received income of \$500 or more from the entity listed in Part 1 during the reporting period? No  Yes  - amount is:

\$500 - \$1,000       \$1,001 - \$10,000  
 \$10,001 - \$100,000       Exceeds \$100,000

Was income received through your spouse or registered domestic partner?  No  Yes

**3. Filer Information - Cont.**

D. Have you received loans from the entity in Part 1 for which the balance exceeded \$500 during the reporting period? No  Yes  - highest balance:

\$500 - \$1,000       \$1,001 - \$10,000  
 \$10,001 - \$100,000       Exceeded \$100,000

If you checked "yes," was the loan:

Secured  Unsecured Interest rate: \_\_\_\_\_%

Was the loan entirely repaid within the last 12 months?

No  Yes

E. Have you received gifts from the entity listed in Part 1 within the last 12 months valued at \$50 or more? No  Yes  - describe below.

Description: \_\_\_\_\_

Value: \$ \_\_\_\_\_ Date Received: \_\_\_\_/\_\_\_\_/\_\_\_\_

F. Has the entity in Part 1 paid you for your travel? No  Yes  - describe below.

Type of Payment: (check one)  Gift  Income

Amt: \$ \_\_\_\_\_ date(s): \_\_\_\_/\_\_\_\_/\_\_\_\_ \_\_\_\_/\_\_\_\_/\_\_\_\_  
 (if applicable)

Description: \_\_\_\_\_

**4. Verification**

I have used all reasonable diligence in preparing this statement. I have reviewed this statement and to the best of my knowledge the information contained herein and in any attached schedules is true and complete. I certify under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Date Signed \_\_\_\_\_  
 (month, day, year)

Signature \_\_\_\_\_  
 (File the originally signed statement with your university.)



# Instructions for Completing Form 700-U (continued)

CALIFORNIA  
FORM 700-U

## What is a Travel Payment?

Travel payments include advances and reimbursements for travel and related expenses, including lodging and meals.

- Travel payments are **gifts** if you did not provide services which were equal to or greater in value than the payments received. You must disclose gifts totaling \$50 or more from a single source during the period covered by the statement. Gifts of travel are reportable without regard to where the donor is located.

When reporting travel payments which are gifts, you must provide a description of the gift and the date(s) received.

- Travel payments are **income** if you provided services which were equal to or greater in value than the payments received. You must disclose income totaling \$500 or more from a single source during the period covered by the statement. The filer has the burden of proving the payments are income rather than gifts.

When reporting travel payments as income, you must describe the services you provided in exchange for the payment. You are not required to disclose the date(s) for travel payments which are income.

Gifts of travel may be subject to a \$390 gift limit. In addition, certain travel payments are reportable gifts, but are not subject to the gift limit. See the FPPC fact sheet entitled "Limitations and Restrictions on Gifts, Honoraria, Travel, and Loans," which can be obtained from the FPPC at [www.fppc.ca.gov](http://www.fppc.ca.gov).

### You are **not** required to disclose:

- Travel payments received from any state, local, or federal government agency for which you provided services equal or greater in value than the payments received
- Travel payments received from your employer in the normal course of your employment
- Payments or reimbursements for transportation within California in connection with an event at which you gave a speech, participated in a panel or seminar, or performed a similar service

- Food, beverages, and necessary accommodations received directly in connection with an event held inside or outside California at which you gave a speech, participated in a panel, or provided a similar service (note that payments for transportation outside of California are reportable)
- A travel payment which was received from a nonprofit entity exempt from taxation under IRS Code section 501(c)(3) for which you provided equal or greater consideration

Check the box to indicate if the payment was a gift or income, report the amount, and disclose the date(s) if applicable.

## Violations

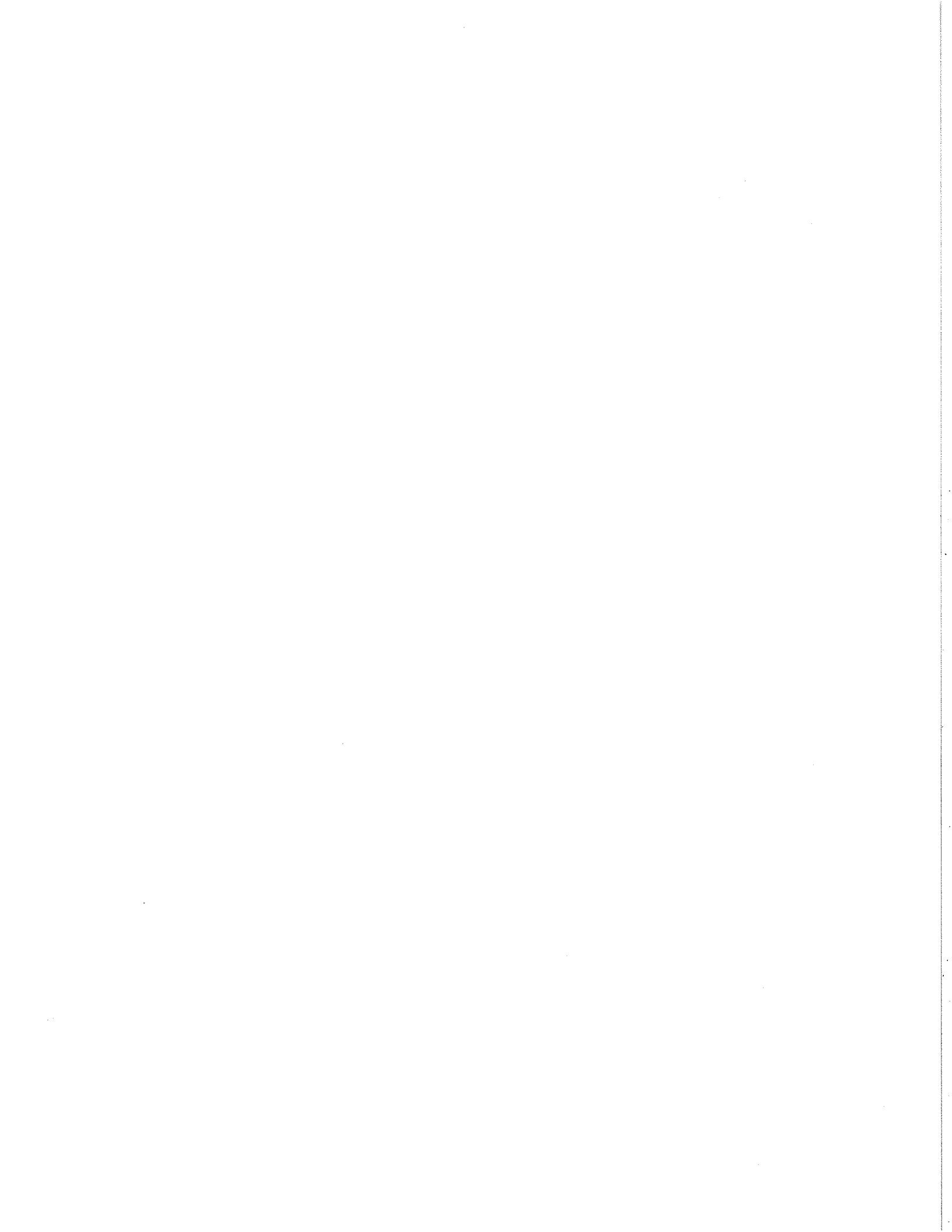
Failure to file the required Statement of Economic Interests or failure to report a financial interest may subject a principal investigator to civil liability, including fines, as well as University discipline. (Gov. Code sections 81000-91014)

## Privacy Information Notice

Information requested on all FPPC forms is used by the FPPC to administer and enforce the Political Reform Act (Gov. Code sections 81000-91014 and Regulations 18109-18997). All information required by these forms is mandated by the Political Reform Act. Failure to provide all of the information required by the Act is a violation subject to administrative, criminal or civil prosecution. All reports and statements provided are public records open for public inspection and reproduction.

If you have any questions regarding this Privacy Notice or how to access your personal information, please contact the FPPC at:

Manager, Filing Officer Programs  
428 J Street, Suite 620  
Sacramento, CA 95814  
(916) 322-5660



Disclosure of Financial Interests Related to Projects Sponsored  
By PHS, NSF or other Agencies Adopting the Federal Requirements

Lead Principal Investigator:	<input type="text"/>
Project Title:	<input type="text"/>
Performance Period:	<input type="text"/>
Sponsor:	<input type="text"/>
Amount:	<input type="text"/>
This Disclosure is for:	
<input type="radio"/> New Proposal	<input type="radio"/> Continuation/Renewal
<input checked="" type="radio"/> Change in Financial Interest	<input type="radio"/> New Investigator Added to Project
	<input type="radio"/> Supplement

For definitions of "Significant Financial Interest" and "Related Financial Interest," please see page three.

DISCLOSURES AND CERTIFICATIONS

A. **Lead Principal Investigator.** By signing this section, the lead principal investigator certifies that this form provides (1) a complete disclosure of all individuals involved in the design, conduct, or reporting of activities associated with this project, and (2) a complete disclosure of my significant financial interests related to this project.

Do you, your spouse or your dependent children have any significant financial interests and/or related financial interests to the work to be conducted as part of the above-referenced project?

- No
- Yes, and the 700UA/800UA Disclosure of Economic Interests Addendum is attached.

I understand that I must submit a new disclosure for any change that creates, or modifies, a significant financial interest.

\_\_\_\_\_  
Signature of Lead Principal Investigator

\_\_\_\_\_  
Date

Type name of Lead Principal Investigator:

**B. Other UCSB Researchers.** (Any researchers who are not Lead PI, but are involved in the design, conduct, or reporting of activities associated with this project must sign this disclosure form.)

Do you, your spouse, or your dependent children have any significant financial interests and/or related financial interests to the work to be conducted as part of the above-referenced project? (Please see the third page for the definition of "significant financial interest" and "related financial interest")

No       Yes, and the 700UA/800UA Disclosure of Economic Interests Addendum is attached.

I understand that I must submit a new disclosure for any change that creates, or modifies, a significant financial interest.

Name:

\_\_\_\_\_  
Signature of Investigator/Researcher

\_\_\_\_\_  
Date

[Empty rectangular box for typing name]

Typed name of Investigator/Researcher

Do you, your spouse, or your dependent children have any significant financial interests and/or related financial interests to the work to be conducted as part of the above-referenced project? (Please see the third page for the definition of "significant financial interest" and "related financial interest")

No       Yes, and the 700UA/800UA Disclosure of Economic Interests Addendum is attached.

I understand that I must submit a new disclosure for any change that creates, or modifies, a significant financial interest.

Name:

\_\_\_\_\_  
Signature of Investigator/Researcher

\_\_\_\_\_  
Date

[Empty rectangular box for typing name]

Typed name of Investigator/Researcher

Completion of this form is mandatory for all Investigators on proposals to the National Science Foundation (NSF) the Public Health Service (PHS), or other sponsors that have adopted the federal requirements for public disclosure. This information is required to comply with the University of California "Policy on Disclosure of Financial Interests and Management of Sponsored Projects" and federal regulations regarding disclosure of any financial interests that would reasonably appear to be affected by the conduct of a sponsored project. The information may be released or transmitted to the sponsor, including federal agency representatives, and according to the to the California Public Records Act, may also be released to the public, upon request.

## Definitions

**“Significant Financial Interest.”** A “significant financial interest” is anything of monetary value, including, but not limited to:

- (a) Income exceeding \$10,000 when aggregated for an Investigator and the Investigator’s spouse and dependent children from a single Entity (business, public or non-profit) including salary, consultant payments, honoraria, royalty payments, dividend, loan, or any other payments or consideration with value, including payments during the past 12 months or expected to be received in the next 12 months. Income from a Public or Non-profit Entity for seminars, lectures, teaching engagement or service on advisory committees or review panels is exempt.
- (b) Equity in the form of stock, stock options, real estate, loan to, or any other investments or ownership interest exceeding \$10,000 (current market value) or a 5% ownership interest, for any one enterprise when aggregated for an Investigator, the Investigator’s spouse and dependent children.
- (c) 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,
- (d) 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 Regents.

A significant financial interest does not include (1) payments made by the Regents; (2) income from seminars, lectures or teaching engagements sponsored by a public or non-profit entity; or (3) income from service on advisory committees or review panels for public or non-profit entities.

**“Related Financial Interest.”** A related financial interest is any financial interest that does not rise to the level of a Significant Financial Interest but, *“that would reasonably appear to be affected by the search for which funding is sought; and in entities whose financial interests would reasonably appear to be affected by the research”* (See, 42 CFR Part 50.604 and 45 CFR Part 94.4).

Examples of fund related financial interests could include:

- (a) The Investigator is carrying out a project and the results of that project would be relevant to the development, manufacturing, or improvement of the products or services of the entity in which there is a financial interest;
- (b) 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;
- (c) 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 to make referral of participants to, or make purchases from the entity; or
- (d) The Investigator has a financial interest in an entity that is part of a consortium or that will otherwise participate in the sponsored project. Financial interests which are not related to the sponsored project do not need to be disclosed.



DISCLOSURE OF ECONOMIC INTERESTS:  
ADDENDUM

Disclosing Investigator:

Status on Project (PI, Key Personnel, etc.):

Project Title:

Project Performance Period:

Sponsoring Entity:

If different, entity related to financial interest ("Related Entity"):

Type of Award:  Gift  Contract or Grant

## DESCRIPTION OF FINANCIAL INTERESTS

**Position of Responsibility at Sponsoring Entity/Related Entity:** If the disclosed financial interest relates to a position of responsibility at the Sponsoring Entity/Related Entity (such as acting as director, officer, partner, trustee, or another position of management), please provide the following information:

1. Position Held By:  Self  Spouse  Dependent Child
2. Date Position Assumed:
3. Is the position still held?  Yes  No  
If no, date of resignation:
4. Describe the roles and responsibilities of this position:
5. Describe the relationship of this position to the proposed project:

**Investment in the Sponsoring Entity/Related Entity:** If the disclosed financial interest relates to an investment in the Sponsoring Entity/Related Entity, please provide the following information:

1. Holder of Investment:  Self  Spouse  Dependent Child
2. Nature of Investment (*Check only what applies to your interest*):
  - Publicly Traded Stock  
Number of Shares:            Total Value of Shares: \$
  - Privately Held Stock  
Number of Shares:            Total Value of Shares: \$  
What percentage ownership interest does this currently represent?  
 0-5%     6-10%     11% - 25%     >26%
  - Stock Option  
Value of Option per Share:            \$  
(current value if publicly traded, internal or contracted value if privately held)  
Number of Options:                      \$  
Vesting Date:

What percentage ownership interest does this currently represent?

0-5%     6-10%     11% - 25%     >26%

Other Ownership Interest

Please describe type of ownership interest involved., and the percentage of ownership owned:

Other Investment (including real estate):

Please describe the type, extent and amount of your investment:

**Income Received From Sponsoring Entity/Related Entity:** If the disclosed financial interest relates to income received from the Sponsoring Entity/Related Entity, please provide the following information:

1. Income recipient:  Self     Spouse     Dependent Child

2. Is income still being received?     Yes     No  
If no, date income stopped:

3. Nature of Income:

Consulting

Is there a written consulting agreement?     Yes     No

If yes, please attach a copy of the agreement.

Please describe the nature of the consulting activities and its relationship to the research project:

Honoraria

Please describe the services for which it was received:

Salary:

Please describe the position for which the salary was received, including its roles and responsibilities.

Other Income (including loans from or to the company)

Please describe the nature of income and services provided.



### DIRECT AND SIGNIFICANT IMPACT

1. Is the Sponsoring Entity/Related Entity a subcontractor, consortium member, supplier of goods, lessor or otherwise involved with the project? If yes, please explain.
  
2. Does, or will, the Sponsoring Entity/Related Entity manufacture or commercialize any device, procedure, drug, vaccine, procedure, or product that is associated with or that will predictably result from the project? If yes, please explain.
  
3. It is reasonable to anticipate that the Sponsoring Entity/Related Entity could be directly and significantly affected by the design, conduct or reporting of the research activity? If yes, please explain.
  
4. Does the Sponsoring Entity/Related Entity hold rights, whether license, ownership or otherwise, to a pending patent application or an issued patent to an invention, or to a copyright for software of yours, your spouse's or your dependent children?  
 No  
 Yes, but license is from the University  
 Yes, and the application, patent or copyright is not owned by the University

### SEPARATION OF UNIVERSITY AND OUTSIDE INTERESTS

1. How are you keeping your interests and obligations to the University and the Sponsoring Entity/Related Entity separate?
  
2. What role did you play in the Sponsoring Entity/Related Entity's decision to make this award (if applicable)?

## OPENNESS OF TEACHING AND RESEARCH ENVIRONMENT

1. Will students be involved in the project? If so, describe their participation:
  
2. Are there any verbal agreements between you and the Sponsoring Entity/Related Entity regarding the publication and dissemination of research results? If so, please explain.
  
3. Will the Sponsoring Entity/Related Entity participate in deciding the direction of the research? If so, how?
  
4. Is the Sponsoring Entity/Related Entity providing any of the following:
  - Proprietary Data
  - Test Materials/Research Tools
  - Equipment
  - Use of Sponsor's Facilities
  - Sponsor's Personnel
  
5. Please list all other sponsors of this research project:

I acknowledge that there will be no publication restrictions placed on myself or any student or postdoctoral working on this project that have not been previously approved by the UCSB Office of Research.

I have used all reasonable diligence in preparing this statement. I certify that, to the best of my knowledge, all of the information contained herein is true and accurate.

\_\_\_\_\_  
Signature of Disclosing Investigator

\_\_\_\_\_  
Date

The principal purpose for requesting this information is to accomplish the independent and substantive review of positive disclosures as provided by the Policy on Disclosure of Financial Interests in Private Sponsors of Research (April 26, 1984) and the conflict of interest policies of the National Science Foundation and the National Institutes of Health. University policy and state law authorize maintenance of this information. Submission of this information is mandatory. The consequences of not providing all or any part of the requested information could be non-acceptance of your award from the proposed sponsor, state enforcement proceedings against you as well as University sanctions. The information is a public record under University policy and State law. Individuals have the right to review their own record in accordance with Academic Personnel Manual Section 160. Information about this policy may be obtained from the Office of the President, Academic Affairs and the UCSB Office of Research. The official responsible for maintaining the above information is the Vice Chancellor for Research and the Senior Vice President – Academic Affairs.

**ABBREVIATED ADDENDUM TO STATEMENT OF ECONOMIC INTERESTS**

Since my most recent application statement was filed there has been no change in my

financial involvement with \_\_\_\_\_  
Sponsor

and there is no material change in the terms under which my research is being conducted.

PRINCIPAL INVESTIGATOR: \_\_\_\_\_

RESEARCH PROJECT TITLE: \_\_\_\_\_

\_\_\_\_\_  
Signature of Principal Investigator

Date

\_\_\_\_\_  
Administering Department

