



## ACADEMY POLICY & PROCEDURE MANUAL

### Conflict of Interest- Sponsored Programs

<b>Policy Number:</b>	AA-09-001
<b>Policy Administrator:</b>	VP of Administration & Finance and The Provost & VP for Academic Affairs
<b>Policy Initiator:</b>	Dean of Extension Services
<b>Authority:</b>	Title 42 CRF Part 50 Subpart F, & Title 45 CFR Part 94 (Research Contracts), Uniform Guidance 2 CFR 200, California Code of Regulations Title 2 Section 18755, & CSU Executive Order 890
<b>Effective Date:</b>	January 2015
<b>Revised Date:</b>	June 2016
<b>Approved:</b>	President Thomas A. Cropper
<b>Approval Signature:</b>	/s/

**Purpose:**

This Policy establishes the process and responsibility to comply with conflict of interest regulations related to the Principal Investigator (PI), students, and research staff engaged in sponsored programs activities.

**Scope:**

California State University Maritime Academy (Cal Maritime) is responsible for ensuring that Sponsored Program funding received by the university is managed and spent according to the terms and conditions of the sponsor, as well as the policies and regulations applicable to Cal Maritime. This extends to our responsibility to ensure that sponsored programs funding is expended without financial conflicts of interest.

**Accountability:**

The Dean of Extension Services is delegated the responsibility to ensure compliance with federal, state, and Cal Maritime regulations regarding the disclosure, filing, and resolution of conflicts of interest related to sponsored programs.

**Policy:**

Cal Maritime requires PIs and key personnel on a sponsored project to complete a disclosure form before expenses can be charged to an award. PIs are required to disclose a list of significant financial interests that could be reasonably expected to bias the design, conduct, or reporting of the project.

In addition, as required by the California State University(CSU) Conflict of Interest policy, Cal Maritime requires the annual completion of a Statement of Economic Interests Form 700, for all

the University. Some faculty and MPPs at Cal Maritime may be required to complete both a project specific disclosure form for Sponsored Programs and a statement of economic interests form for Human Resources.

For all non-NIH awards, PIs who are employed by the University must complete the CSU Ethics and Conflict of Interest Training within 6 months of receiving an award. For NIH awards, the training should be completed before expenditures are charged to the award. Subsequent training is required at least once each consecutive period of two calendar years that the award is in place.

**A. Sub-Recipients**

1. Cal Maritime requires sub-recipients to identify whether they will follow Financial conflict of interest (FCOI) policy, or if they have their own in place; if following their own FCOI policy, they must also verify that their policy complies with all appropriate regulations.
2. Cal Maritime requires that the sub-







**Procedure:**

**A. Requirements Specific to NSF Funds**

For NSF awards, the Dean of Extension Sergio A.









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