Date: November 5, 2009

To: All Principal Investigators, Department Chairs, MSOs and Development Officers

From: Nancy R. Lewis
       Academic Conflict of Interest Coordinator
       Office of Research

Subject: Academic Conflict of Interest Policy for Gifts

It has come to our attention that there is some confusion over when a Form 700U conflict of interest form must be filled out by Principal Investigators for gifts to the university for research. We hope the following reiteration of existing policy will be helpful to you:

Form 700U must be filled out for every gift that is received by a principal investigator for his or her research, whether it is from an individual, foundation or corporation. This policy applies to gifts from the faculty member for his or her own research, as well as gifts from his or her spouse, domestic partner, or dependent child. When transmitting a personal gift to the University, to avoid confusion about who is giving the gift and in keeping with University policy on the use of letterhead, University stationery may not be used.

University policy requires a principal investigator to disclose whether or not he or she has a direct or indirect financial interest in the sponsor of research which is funded in whole or in part (a) through a contract or grant with a non-governmental entity, unless the entity is exempt from the disclosure requirement (see http://www.ucop.edu/research/exempt.html for list of exempt entities) or (b) by a gift from a non-governmental entity which is earmarked by the donor for a specific research project or a specific principal investigator. Disclosure on the Form 700U must be filed (a) before final acceptance of such a contract, grant, or gift; and (b) when funding is renewed. When disclosure indicates that a financial interest exists, an independent substantive review by the Conflict of Interest Committee of the disclosure statement and the research project must take place prior to acceptance of the contract, grant, or gift. Department chairs must disqualify themselves from approving a research proposal for a project which is funded in whole or in part by a non-governmental entity in which they have a financial interest.

Review by the Conflict of Interest Committee is necessary to ensure that the gift is received as a gift to the university and not to the individual faculty member. Gifts may only be accepted by the university if the gift is intended to support bona fide university activities or purchases and such gifts are subject to all university policies and procedures for expenditure.

Questions related to this policy should be referred to coi@research.ucsb.edu. For additional information regarding UCSB’s Academic Conflict of Interest policies and forms, see http://research.ucsb.edu/compliance/conflict-of-interest

Reference:
Form 700U – Statement of Economic Interest
Form 700UA/800UA- Disclosure of Economic Interests Addendum
Form 700UG- Disclosure for Gifts from Individuals (Attached)

cc: Gift Administration