

Month and Year of Award \_\_\_\_\_

Award Number \_\_\_\_\_

Project Account Number \_\_\_\_\_

**SAN JOSE STATE UNIVERSITY FOUNDATION  
CONFLICT OF INTEREST DISCLOSURE FORM**

Investigator Name: \_\_\_\_\_

Department/College: \_\_\_\_\_

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

Proposed Sponsor: \_\_\_\_\_

AT THIS TIME, I HAVE NOTHING TO DISCLOSE

I am disclosing the following significant financial interests related to the entity funding the project or the entity involved with the project which is proposed to NSF or HHS. (Responses should include the investigator, his/her spouse, and any dependent children.)

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

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

Principal Type of Business: \_\_\_\_\_

If Entity is the Sponsor, Amount of Funding Request: \$ \_\_\_\_\_

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

Do you have an investment of \$1,000 or more in the entity? Yes  No

Do you hold an equity position of 5% in the entity? Yes  No

Have you received income of \$250 or more, or gifts valued at \$50 or more from the entity? (Exclude income received from the entity for a current or previously funded project.) Yes  No

Have you received a loan from the entity for which the outstanding balance exceeded \$250 in the past 12 months? Yes  No

Do you have an interest in any intellectual property rights belonging to the entity? Yes  No

Investigator Certification:

- I agree to update this disclosure either on an annual basis, or as new reportable significant financial interests are obtained.
- I agree to cooperate in the development of a Resolution Plan to address any actual or potential conflict of interest identified via this Disclosure.
- I agree to comply with any conditions or restrictions imposed by SJSU to manage, reduce, or eliminate actual or potential conflicts of interest or forfeit the award.

Signed: \_\_\_\_\_

Date: \_\_\_\_\_

Investigator

Endorsements: I have reviewed the significant financial interest disclosure and believe that no significant financial interest exists or if one does exist that it is possible to develop and execute, prior to award, a Resolution Plan to manage, reduce, or eliminate any actual or potential conflict of interest; and, therefore, I recommend that the proposal be submitted to the agency at this time.

Signed: \_\_\_\_\_

Date: \_\_\_\_\_

AVP for Graduate Studies and Research

## GUIDELINES FOR COMPLETING THE FINANCIAL DISCLOSURE FORM

This form is required by law and all principal investigators must provide the requested information (regarding themselves and members of their immediate family) using common sense about potential conflicts that might arise in the conduct of proposed research because significant financial interest in some entity beyond the SJSU campus might influence decision-making by the principal investigator. The form does not ask you to disclose any financial interests that are clearly unrelated to your proposed research. Financial interests that might cause you to disclose are ownership of a business that produces products related to your research, stock holdings in a potential sub-contractor's business, etc. That you own a home, or have other investments unrelated to your research, normally does not represent a significant financial interest as defined by the law.

In your consideration of disclosure, your professional responsibility must be your guide. If you are confident that none of your investments or business involvement are in any way related to your research, then use the default **NOTHING TO DISCLOSE** box, sign the form, and attach it to your proposal. If you do have information that requires disclosure, be as complete as possible in your disclosure. The information you provide will remain confidential.

**Q:** What happens to information I disclose?

**A:** The disclosure is reviewed by the AVP, Graduate Studies and Research, to determine whether there is a conflict of interest.

**Q:** If a conflict of interest is determined, do I have a chance to challenge the conclusion?

**A:** Yes, a dialogue with the AVP/GS&R will occur immediately.

**Q:** If the conclusion is sustained, then what happens?

**A:** The AVP/GS&R will work with you to develop a resolution plan that will be approved by your college dean. Such a resolution plan may take any reasonable form that provides assurance that significant financial interests are unlikely to interfere with decisions regarding the proposed research. The plan will go into effect at the time of award, prior to the expenditure of any funds. Several resolution plan options are explained in university policy S95-9.

A *potential conflict of interest* occurs when there is a divergence between an individual's private interests and his/her professional obligations to the university (or research sponsor) such that an independent observer might reasonably question whether the individual's professional actions or decisions are determined by considerations of personal gain, financial or otherwise. An *actual conflict of interest* depends on the situation and not on the character or actions of the individual. For purposes of the disclosure, **a conflict of interest exists when significant financial interest could directly and significantly affect the design, conduct, or reporting of sponsored projects.**

The University's Conflict of Interest Policy has been approved by the Academic Senate. For a complete copy, please see your Foundation Sponsored Programs Manager.