

Policy Guidelines on Disclosing Individual Financial Interests in Non-Governmental Donors of Gifts

University of California, Merced

I. DEFINITIONS

Principal Investigator (PI): For the purposes of this policy, the person to whom a gift is directed or the person whose research the gift is intended to support. This designation conforms to the requirements of the Statement of Economic Interests for Principal Investigators (California Form 700-U) and does not require that the recipient of the gift meet the eligibility criteria of a Principal Investigator. A Principal Investigator is responsible for the design, scientific/technical conduct, management, and reporting of a research, training, or public service project. As such, the University only recognizes one individual as the Principal Investigator on a project and he/she must personally participate in the project to a significant degree. At the University of California, Merced any member of the Academic Senate may serve as a Principal Investigator.

Key Personnel: Any other persons responsible for the design, conduct, or report of the research or results. This includes co-principal investigators, staff, students and others with the above responsibilities.

Financial Interest: As used in this procedure, the term "Financial Interest(s)" is based on definitions taken from the Political Reform Act of 1974 and includes, but is not limited to:

- A position as director, officer, partner, trustee, employee of, or any other position of management in the sponsor; and/or
- Income from the sponsor (including but not limited to salaries and wages, consulting income, honoraria for services performed, per diem, reimbursement for expenses, rental income, dividends and interest, and proceeds from sales) aggregating \$500 or more in value received by or promised within 12 months prior to the time the award is made; and/or
- An investment including stocks, bonds, warrants, and options, including those held in margin or brokerage accounts, in the sponsor worth more than \$2,000; and/or
- A gift of \$50 or more, or multiple gifts totaling \$50 or more, from the sponsor, received by or promised to the researcher within 12 months prior to the time the award is made; and/or
- Loans from the sponsor for which the outstanding balance has exceeded \$500 in the past 12 months.

II. POLICY

In accordance with State of California regulations and University of California and UC Merced policies, a PI and all key personnel must disclose any Financial Interest in a non-governmental entity that is giving certain gifts to the University *before* those gifts can be accepted by the University. In general, gifts are awarded to the University irrevocably either for unrestricted or designated purposes, but without any contractual requirements imposed upon the University. When gifts are earmarked for a specific PI's use or are given to support specific research, the recipient PI must file a Statement of Economic Interests (700-U) form. Reporting is required for the individual, his/her spouse or registered domestic partner, and any dependent children. All information requested on disclosure forms is mandatory (see Attachments A and B).

Certain sponsoring organizations are exempt from the reporting requirements (see UCOP's [list of the exempt organizations](#)). In addition to the institutions named on the list, "all non-profit, tax-exempt educational institutions" are exempt. Private, non-profit colleges and universities are among the exempt organizations.

III. PROCEDURES

A. Completion of Form 700-U (Statement of Economic of Economic Interests) Prior to Acceptance of a Gift

RESPONSIBILITY	ACTION
Principal Investigator (PI)	Completes Form 700-U (Statement of Economic Interests) and, if a Financial Interest is disclosed, also completes a Disclosure Supplement.
	Forwards completed forms to UCM Office of Research
University Relations	Notifies gift recipient that disclosure is necessary and contact the UCM Office of Research.
	Submits any other relevant case materials to the Office of Research
Conflict of Interest Review Committee (COIC)	Reviews case materials. May also interview PI, other UCM officials and/or seek additional information or consultation as necessary.
	Forwards recommendation about acceptance of the gift to the Vice Chancellor for Research. As appropriate, recommends action for eliminating, reducing or managing any real or perceived conflict of interest.
Vice Chancellor for Research	Determines whether or not gift should be accepted, based on COIC review and recommendation.
	Notifies the PI, the COIC, Development and, as appropriate, other campus officials of decision.

B. Access to Statements

Under California state law, completed Statements of Economic Interests (700-U) and other information required under this procedure are available to any member of the public upon request.

C. Sanctions

Failure of an individual to file a complete and truthful Statement of Economic Interests for pending gifts, or failure to comply with any conditions or restrictions directed or imposed, including failure to cooperate with appointed project monitoring bodies, will be grounds for disciplinary actions pursuant to the University Policy on Faculty Conduct and the Administration of Discipline (Academic Personnel Manual, APM-016) and/or other applicable employee disciplinary policies.

IV. REFERENCES

1. [UCM Policy on Conflict of Interest](#);
2. [Memorandum from Vice Provost Robert Shelton \(PDF\)](#), February 4, 1997;
3. [Guidelines for Disclosure and Review of Principal Investigator's Financial Interest in Private Sponsors of Research](#), April 27, 1984;
4. [University Policy on Disclosure of Financial Interest in Private Sponsors of Research](#), April 26, 1984;
5. [Academic Personnel Manual, Section 025 \(PDF\)](#) - Conflict of Commitment and Outside Activities of Faculty Members, revised July 1, 2001;
6. [Academic Personnel Manual, Section 016 \(PDF\)](#) - University Policy on Faculty Conduct and the Administration of Discipline;
7. [Academic Decisions Exception Regulation](#) (California Code of Regulations, Title 2, §18702.4(c)(2));
8. [Political Reform Act of 1974](#) (California Government Code, Section 81000, et seq.).

V. ATTACHMENTS

A. Form 700-U, Statement of Economic Interests for Principal Investigators and Instructions for Completing Form 700-U

B. Disclosure Supplement (Supplement to Form 700-U)