
UCLA Procedure 925.1: Disclosing Financial Interests in Non-Governmental Donors of Gifts

Issuing Officer: Vice Chancellor for Research
Responsible Dept: Office of Research Administration
Effective Date: July 11, 2005
Supersedes: UCLA Procedure 925.1, dated August 30, 2004

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I. REFERENCES

1. UCLA Policy 150, Conflict of Interest;
2. Memorandum from Vice Provost Robert Shelton, February 4, 1997;
3. Academic Personnel Manual, APM-028 - Disclosure of Financial Interest in Private Sponsors of Research, dated 4/29/2010;
4. UCLA Policy 925, Financial Conflicts of Interest in Research;
5. Academic Personnel Manual, APM-025 - Conflict of Commitment and Outside Activities of Faculty Members, revised July 1, 2001;
6. Academic Personnel Manual, APM-016 – 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.).

II. DEFINITIONS

Principal Investigator (PI): For the purposes of this procedure, 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 California Form 700-U (Statement of Economic Interests for Principal Investigators) and does not require that the recipient of the gift meet the eligibility criteria of a Principal Investigator as defined in UCLA Policy 900.

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.

III. STATEMENT

In accordance with State of California regulations and UC and UCLA policies, a PI 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 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 (for a list of the exempt organizations, see <http://www.ucop.edu/research-policy-analysis-coordination/policies-guidance/conflict-of-interest/list-of-non-governmental-entities-exempt-from-disclosure-requirement.html>). 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.

IV. PROCEDURES

A. Completion of Form 700-U Prior to Acceptance of a Gift

RESPONSIBILITY	ACTION
Principal Investigator (PI)	Completes Form 700-U and, if a Financial Interest is disclosed, also completes a Disclosure Supplement.
	Forwards completed forms to UCLA Gift Services.
Gift Services	Ensures forms have been submitted, and reviews for completeness.
	Identifies all positive disclosures and collects additional background information and clarification as needed to prepare a case for review by the campus Conflict of Interest Review Committee (CIRC; formerly known as the Independent Substantive Review Committee (ISRC)).
	Submits case materials to the CIRC, retaining the original Form 700-U as the office of record.
	OR
	If Form 700-U is negative, forwards one copy of form (with all materials related to the award) to Corporate Accounting. Files and retains original Form 700-U in the gift file, as the office of record.
Conflict of Interest Review Committee (CIRC)	Reviews case materials. May also interview PI, other UCLA 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 CIRC review and recommendation.
	Notifies the PI, the CIRC, Gift Services and, as appropriate, other campus officials of decision.

B. Access to Statements

Under California state law, completed Statements of Economic Interests 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.

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 Forms 700-U & 740).

For the above-listed forms, see the UCLA Research Policy & Compliance Web site at: <http://ora.research.ucla.edu/rpc/Pages/RPCHome.aspx>.

Issuing Officer

/s/ Roberto Peccei

Vice Chancellor for Research

**Questions concerning this policy or procedure should be referred to
the Responsible Department listed at the top of this document.**
