

---

## **UCLA Policy 925: Financial Conflicts of Interest in Research**

---

Issuing Officer: Vice Chancellor for Research

Responsible Dept: Office of Research Administration

Effective Date: August 24, 2012

Supersedes: UCLA Policy 925, dated 5/22/2007

---

### **I. INTRODUCTION**

### **II. BACKGROUND**

### **III. STATEMENT**

### **IV. REFERENCES**

#### **I. INTRODUCTION**

UCLA is committed to ensuring that research and scholarly activities are carried out under the highest standards of ethical conduct, and adhere to Federal and State regulations and University policies governing the conduct of research. Over the years a variety of specialized policies and guidelines have been issued in recognition of the need for guidance in this area and in related areas of ethical standards and codes of conduct. This Policy is specifically focused on the area of financial conflicts of interest in research.

#### **II. BACKGROUND**

University of California faculty and staff engage in increasingly complex relationships with outside entities, both for-profit and non-profit. UCLA supports the translation of results from these relationships into practical applications for the public good. To this end, the University supports patenting and licensing activities to ensure that inventions are protected, and to permit faculty to participate in the establishment of industry partnerships designed to commercialize novel technologies, to accept company-sponsored research funding, and to consult for outside organizations.

#### **III. STATEMENT**

Faculty and staff relationships with outside entities must support the UCLA mission and its principal objectives of teaching, research, and service, but should not create inappropriate external biases affecting the freedom of faculty to pursue all areas of academic inquiry.

A financial conflict of interest in research may exist when an individual or institution has financial interests in the outcome of the research that might compromise the integrity of the research. This Policy provides the mechanism for the review of such interests in order to determine whether a financial conflict of interest exists and, if so, whether action must be taken to manage the conflict before the contract, grant, gift, or Material Transfer Agreement supporting the research may be accepted.

- A.** Under this Policy, UCLA employees with responsibility for the design, conduct or reporting of a project supported in whole or in part by contracts or grants for research, material transfer agreements, and the receipt of certain gifts, are required to file disclosures of financial interests as required under State of California, and Federal regulations and policy, and UC policies.

The terms financial interest and significant financial interest are defined under State of California and Federal regulations and policy. They include anything of monetary value that meets the State or Federal thresholds for disclosure.

- B.** Specific thresholds for disclosing financial interests are defined under State of California and Federal regulations and have been incorporated into UCLA policies and procedures for reporting of those interests. The policies, procedures and forms for disclosing financial interests vary depending upon the source of the project funds. For more information, refer to:

- UCLA Procedure 925.1, Disclosing Financial Interests in Non-Governmental Donors of Gifts.
- UCLA Procedure 925.2, Disclosing Financial Interests in Non-Governmental Sponsors of Contracts, Grants, and Material Transfer Agreements for Research.
- UCLA Procedure 925.3, Disclosing Financial Interests Related to Federally Sponsored Research Projects (except Public Health Service).
- UCLA Policy 926, Public Health Service Regulations on Objectivity in Research.

Disclosures of financial interests are reviewed by the campus Conflict of Interest Review Committee (CIRC), appointed by the Chancellor and advisory to the Vice Chancellor for Research, or by other designated campus officials. Upon completion of the reviews, recommendations are forwarded to the Vice Chancellor for Research who makes the final decision about acceptance of the support and any measures that may be necessary to manage financial conflicts of interest that have been identified.

- C. State of California regulations also require that individuals responsible for the review and approval of research conducted under UCLA's auspices disqualify themselves from influencing or participating in decisions related to research supported by entities in which they have a personal financial interest. This means that department chairs, deans, and other campus officials must disqualify themselves from approving proposals for projects supported by entities in which they have a financial interest.

#### IV. 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. University of California Policy on Disclosure of Financial Interests and Management of Conflicts of Interest, National Science Foundation Awards, Revised December 23, 2014;
5. University of California Policy on Disclosure of Financial Interests and Management of Conflicts of Interests, Public Health Service Research Awards, August 2012;
6. University of California: Political Reform Act Disqualification Requirements, January 2007;
7. University of California, Conflict of Interest Code.

**Issuing Officer**

**/s/ James S. Economou**

---

**Vice Chancellor for Research**

---

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

---