



Roberto Peccei
Vice Chancellor for Research
2147 Murphy Hall
140501

August 14, 2003

TO: Faculty and Administrative Officers

FROM: Vice Chancellor Roberto Peccei

SUBJECT: Conflict of Interest in Research

Attached is a package consisting of a campus policy and procedures related to conflicts of interest in research.

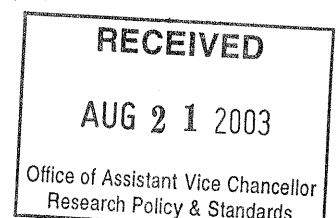
Policy 925, "Financial Conflicts of Interest in Research," is new. This policy acknowledges the fact that faculty and staff now engage in increasingly complex relationships with outside entities through relationships that are expected to support the UCLA mission but not create inappropriate external biases. It also provides a mechanism for soliciting and reviewing financial interests in a sponsor of research to determine whether a financial conflict of interest exists and if so, whether action must be taken to eliminate, reduce or manage the conflict.

Also included are three procedures:

- Procedure 925.1 deals with reviewing financial interests in donors of gifts for research.
- Procedure 925.2, which revises former Procedure 921.1, deals with reviewing financial interests in non-governmental sponsors of contracts and grants for research.
- Procedure 925.3, which revises former Procedure 921.2, deals with reviewing financial interests related to government-sponsored research projects.

Issuance of the policy and changes in the procedures were prompted by several events:

- A local decision to implement a recommendation made by the campus Task Force on Financial Conflicts of Interest in Clinical Research about soliciting disclosures from all Key Personnel rather than only PIs and Co-PIs.
- A change by the State of California Fair Political Practices Commission (FPPC) in disclosure thresholds for income (from \$250 to \$500) and equity (from \$1000 to \$2000).



- Issuance and mandated use by the FPPC of Form 700-U to replace Form 730-U previously used by PIs and Co-PIs to disclose financial interests in non-governmental sponsors of research.
- Creation of a local form which parallels the 700-U, and is to be used by all other Key Personnel disclosing financial interests in non-governmental sponsors of research.
- Modification of other locally designed forms used to solicit information on disclosures under Federal regulations, and to collect supplemental information on all disclosures, in an effort to reduce the amount of required follow-up and to accelerate the review process.

Policy 925 went into effect on June 12, 2003. The procedures were effective as of August 1, 2003. Use of the State of California Form 700-U and revised UCLA forms is effective immediately. The policy, procedures and forms can be accessed online at:
<http://www.research.ucla.edu/sr2/coi.htm>.

Questions about the policy, procedures or forms should be directed to Ann Pollack, Assistant Vice Chancellor Research Policy and Standards at x40387 or apollack@resadmin.ucla.edu; or to Laura Crowley, Coordinator, Research Policy and Compliance at x42642 or lcrowley@resadmin.ucla.edu.

Enclosures

cc: Assistant Vice Chancellor Ann Pollack
Coordinator Laura Crowley