

**CONFLICT OF INTEREST AND CONFLICT OF COMMITMENT GUIDANCE
 ON FOREIGN ENGAGEMENTS FOR RESEARCHERS**

It is essential for UC San Diego researchers to be transparent and fully disclose engagements with foreign entities to UC San Diego on their Conflict of Interest and Conflict of Commitment forms (as required).

Conflict of Interest:

Conflict of Interest (COI) policies require all university employees who are conducting research or other related activities to disclose certain financial interests, whether domestic or foreign. For more information about COI policies, see the COI Office website at <http://blink.ucsd.edu/sponsor/coi/policies.html>.

- **Public Health Services (PHS) funded research:** There are foreign influence concerns for Public Health Services (PHS) funded research, i.e., NIH and those agencies who have adopted PHS regulations. PHS funded investigators or researchers that receive income, travel expenses or any type of reimbursement over \$5,000 from a foreign entity (includes companies, foreign institutions/ universities and foreign governments) in the prior twelve-month time period, must disclose the financial interest on the conflict of interest PHS disclosure form.

Conflict of Commitment:

The University of California requires faculty to submit an annual Conflict of Commitment (COC) disclosure indicating whether or not Investigators/Researchers have engaged in outside activities during the fiscal year. Certain activities will require prior approval. It is the faculty member's professional responsibility to completely and accurately disclose all external financial interests and support, affiliations, activities and relationships with any foreign entities. For more information about COC requirements, see the Academic Affairs website at <https://academicaffairs.ucsd.edu/aps/reports/apm/index.html> and the Health Sciences Academic Affairs website at <https://medschool.ucsd.edu/vchs/faculty-academics/academic-affairs/policy-and-resources/Pages/conflict-comm.aspx>.

The table below provides a high-level summary of COC and COI policies, forms, timing and the responsible office:

	Conflict of Commitment	Conflict of Interest
Policies	APM 025 / APM 671	UCSD PPM 200-13, APM 028, UC PHS and NSF
Disclosure Forms	Category I (prior approval) and II	Dependent on outside funding entity
Timing	Category I: Prior to Engagement Category II: Annually	Proposal and/or award stages and then dependent on funding
Responsible Offices	Department Academic Affairs Advisors / Academic Affairs (see the websites noted above) Also see the Academic Affairs Analyst Assignment at http://aps.ucsd.edu/about/analysts.html	Conflict of Interest Office http://coi.ucsd.edu info-coi@ucsd.edu (858) 534-6465

This situation is fluid so there may be additional guidance in the future. If you have any questions or concerns regarding COC or COI, please contact the responsible offices.

Research Compliance and Integrity, Conflict of Interest

Tel: 858-534-6465 / Email: info-coi@ucsd.edu

coi.ucsd.edu