

A. New Federal Grant Applications (Directly to Federal Agencies or to another Institution as a Subawardee on their Federal Award):

1. During the development of any application for any federally-funded project, the Director of Grants Development will inform the Director of Grants and Categorical Accounting of the project investigator(s) on the proposal. The Director of Grants and Categorical Accounting will have each project investigator complete the SCCCD's **Investigators' Statements of Financial Interests** disclosure form. If an investigator(s) have not yet been assigned during the application stage, then the disclosure form will be completed first thing after notification of grant award.
2. The project investigator will complete the disclosure form with either a "No" or "Yes" to declare Financial Interest related to the work to be conducted under the proposed project.
3. When project investigator declares a "Yes" to Financial Interest, the Director of Grants Accounting will alert the Chancellor's Designee.
4. The Designee will determine what conditions or restrictions, if any, should be imposed by SCCCD to manage, reduce or eliminate the conflict of interest, in accordance with Board Policy 3854, **Disclosing Financial Interests Relevant to Federally Sponsored Projects**, before any federal funds are spent.
5. The Designee will keep funding agent appropriately informed if SCCCD finds that it is unable to satisfactorily manage a conflict of interest.
6. All disclosure forms and record of all actions taken to resolve conflicts will be retained for at least three years beyond the termination or completion of the grant to which they relate, or until the resolution of any action, whichever is longer. Disclosure forms for unfunded projects need not be retained.
7. It is the responsibility of the project investigator to have all additional SCCCD investigators to complete the disclosure form. Project investigator will alert the Directory of Grants and Categorical Accounting to have the form produced.
8. The project investigator should inform any institutions receiving subawards from SCCCD that there must be a conflict of interest policy enforced at their site or follow SCCCD policy and procedure prior to spending any federal funds allocated to them. Project investigator will work with the Director of Grants and Categorical Accounting to submit the disclosure form to the subawardee for completion.

B. Annual Update of Disclosure Forms:

1. Financial disclosure forms should be updated annually in March, to be placed in the applicable grant files held by the Grants and Categorical Accounting Office by April 1st of each fiscal year.
2. The Grants and Categorical Accounting Office will send blank forms and reminders prior to April 1st each year to the project investigator.
3. It is the responsibility of the project investigator that all applicable investigators and contractors complete the disclosure forms, including subawardee investigators.
4. On any "Yes" disclosure form to Financial Interest, the Director of Grants and Categorical Accounting will alert the Chancellor's Designee and will follow steps A.4 and 5 listed above.

C. When an Investigator has a Change in Reportable Significant Financial Interest:

1. It is the responsibility of any investigator and contractor to inform the project investigator and the Director of Grants and Categorical Accounting if they have any change in reportable financial interests and to request a blank disclosure form for immediate completion. The same procedure will apply to the project investigator's change in financial interest.
2. On any "Yes" disclosure forms to Financial Interest, the Director of Grants and Categorical Accounting will alter the Chancellor's Designee and will follow steps A.4 and 5 listed above.

D. When a New Investigator is Named to a Federally Sponsored Project or Federally Sponsored Subaward:

1. When a new project investigator or investigator is named to a federally-funded project, the new investigator has 10 working days to request and file a disclosure form.
2. On any "Yes" disclosure form to Financial Interest, the Director of Grants and Categorical Accounting will alert the Chancellor's Designee and will follow steps A.4 and 5 listed above.

E. Sanctions:

Failure of a SCCCDC employee to file a complete and trustful financial disclosure for federally-funded project, or when a new interest is obtained, or failure to comply with any conditions or restrictions directed or imposed, including failure to cooperate with appointed project monitoring bodies, may be grounds for discipline in accordance with applicable bargaining agreements, the California Education Code, and SCCCDC policies in a manner proportionally to the circumstances of the infraction. Agreements with consultant who either fail to file a complete disclosure or fail to comply with any conditions or restrictions imposed may be terminated for cause. In addition, federal regulations may require reports to the federal funding agent of any violations to SCCCDC conflict of interest policy. If an

investigator's failure to comply with this policy has biased the design, conduct, or reporting of federally-funded project, the Designee will promptly notify the appropriate agency of the corrective action taken or to be taken.

F. Policy Review:

This policy will be reviewed for currency at least every 6 years.

Revised 09/29/20

Approved: October 28, 2020

Next Review Date: Fall, 2026

Investigators' Statements of Financial Interests

Under SCCCD BP3854, the Principal Investigator and all other Investigators who share responsibility for the design, conduct, or reporting of certain sponsored projects must report their personal financial interest in any organization(s) that, to the best of the Investigator's knowledge, may have a significant impact on the conduct of this project or might benefit from the anticipated results of the proposed project.

Sponsor: (please check one)

_____ Federal Agency (specify) _____

_____ Subaward from Federal Agency (specify) _____

Reason for Disclosure: ___ New Proposal ___ Additional Support ___ New Investigator ___ New Interest Obtained

Title of Proposal: _____

Disclosure and Certification

By signature below, each individual certifies that either no Significant Financial Interest exists or that a complete listing of all financial interests either in the sponsored project or otherwise related to the project is provided. All individuals named below further acknowledge their responsibility to disclose any new Significant Financial Interest obtained during the term of the award.

The Principal Investigator's signature certifies that all individuals required to make disclosures have been listed below.

Do you, your spouse or registered domestic partner, or dependent children have a Significant Financial Interest related to the work to be conducted under the proposed project? (See reverse for definitions of Significant Financial Interests)

1. _____
Signature (Principal Investigator) Date

- _____ YES, provide Listing
O _____ N

Print or Type Name of Principal Investigator

2. _____
Signature Date

- _____ YES, provide Listing
O _____ N

Print or Type Name of Other Investigator

3. _____
Signature Date

-
____N
O

____YES, provide Listing

Print or Type Name of Other Investigator

4. _____
Signature Date

-
____N
O

____YES, provide Listing

Print or Type Name of Other Investigator

5. _____
Signature Date

-
____N
O

____YES, provide Listing

Significant Financial Interest(s): Significant Financial Interests include but are not limited to:

- **Income** including salary or other payment for services including consulting fees, honoraria, reimbursement of expenses (including travel), royalty payments, dividends, loans from an entity, or any other payments or consideration with value including payments made to a health savings compensation plan, during the prior twelve months or anticipated in the next twelve months, of \$10,000 or more;
- **Equity** in the form of stock, stock options, warrants, real estate, loans to or from an entity, or any other investment or ownership interest exceeding either \$10,000 (current market value if publicly traded; otherwise, amount of investment) or a 5% ownership interest, for any one enterprise;
- **A management position**, whether paid or unpaid, such as board member, director, officer, partner, or trustee;
- **Ownership or other interest** in an entity that is proposed as a subcontractor, consortium member, lessor or otherwise involved in the project;
- **Intellectual property interest** on a patent, patent application, or copyright assigned or licensed to a party other than Santa Clarita Community College District (SCCCD).

Reporting is for the individual, his/her spouse or registered domestic partner, and dependent children. Specifically excluded from the definition of Significant Financial Interests are payments made by SCCCDC, honoraria, reimbursement of expenses, or any other remuneration from SCCCDC including salary, stipends and royalty payments.

Under the California Public Records Act, this information may be made available to the public upon request.

OFFICE USE ONLY

Reviewed in accordance with AP3854:

Director, Grants & Categorical Accounting

Date

Reviewed & Accepted when “Yes” is declared on Page 1:

Chancellor’s Designee

Date