UNIVERSITY OF SAN FRANCISCO | Office of Sponsored Programs

Conflict of Interest

Policy for Sponsored Programs

May 2026

UNIVERSITY OF SAN FRANCISCO | Office of Sponsored Programs

Conflict of Interest

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Effective Date: January 1, 2026
Last Updated: _____, 20__

Responsible University Officer:
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POLICY STATEMENT

This policy outlines the scope, definitions, and rules for complying with the University of San Francisco Conflict of Interest (COI) Policy. It is the policy of University of San Francisco that the highest standards of conduct and honesty are expected of all employees of the University. It is the obligation of those employed to avoid involvement in activities that might conflict -- or might appear to conflict -- with their institutional responsibilities.

Decision making in matters in which a conflict of interest may exist may create an appearance of impropriety. The University believes that it is useful to attempt to reduce to written form some basic rules to which staff and faculty members with administrative

responsibilities ("designated faculty") can refer in evaluating potential conflict situations. The University publishes these rules mindful of the fact that the good judgment of its staff and designated faculty is essential, and that no list of rules can provide direction for all the varied circumstances as they arise.

If you need to report a potential conflict of interest, you may do so either via our University whistleblower program or by emailing us at grantscompliance@usfca.edu.

REASON FOR POLICY

This policy establishes standards and requirements regarding outside professional activities and interests to protect personnel, safeguard USFCA's reputation and financial integrity, and ensure compliance with legal obligations. The policy outlines the requirements for disclosing Outside Professional Activities and Financial Interests, provides a framework for managing, mitigating, or eliminating potential conflicts, and seeks to protect the interests of students, postdoctoral scholars, and others whose work relies on the guidance of faculty and staff. It also identifies situations that require prior approval or are prohibited.

WHO SHOULD READ THIS POLICY

This policy applies to personnel within the University who might commit or cause to be committed the resources of the University. See separate policies relating to all Faculty, and to the Trustees of the Board. In connection with the completion of the university's IRS Form 990 certain designated employees will receive an additional request for information on business or personal relationships that require disclosure in the return.

POLICY TEXT

RULES:

1. Each staff or designated faculty member has a duty to act in the best interests of the University.
2. Staff and designated faculty members who have, directly or through family or business connections; an interest in suppliers of goods or services or in contractors or potential contractors with the University, must not undertake to act for the University in any transaction involving that interest. No staff or faculty member shall participate in the selection, award or administration of a contract with any

party with whom s/he is negotiating respecting potential employment or has any arrangement concerning potential employment.

3. Staff and designated faculty members shall avoid outside employment or business activity involving obligations, which may in any way conflict, or appear to conflict, with the University's interests, including its interest in the full- or part-time services of its staff and faculty members. A conflict of time commitment is considered to exist if outside activities impact the employee's abilities to fulfill his or her responsibilities. Directorships or consultation arrangements for which the staff or faculty member will receive compensation must be cleared with the responsible divisional Senior Vice President, Dean of the Law School, Executive Vice President and Chief Administrative Officer, Executive Vice President and Chief Academic Officer or President ("University Officers") of the University or his or her designee. Written approval must be obtained.
4. Each staff or designated faculty member shall provide full written disclosure of any business or financial enterprise or activity which might influence, or appear to have the capacity to influence, his or her official decisions or actions on University matters. Revised disclosure shall be made whenever a significant change in interest occurs. Employees who have the authority to spend or commit University funds shall make disclosure a matter of record through the annual completion of the attached disclosure statement. The annual statement will be maintained in a confidential file in the Internal Audit department after its review by the appropriate University Officer.

   Staff and designated faculty members are encouraged to seek advance consultation from the appropriate University Officer, or his or her designee, on matters which might involve a conflict of interest or appear to involve one. Further, the staff or faculty member must refrain from participating in any way in the matter until and unless the person to whom the situation was disclosed has determined that no conflict exists or has authorized participation. That determination shall be written and be made promptly.

5. Staff and designated faculty members shall refrain from personal activities, including but not limited to the purchase or sale of securities, real property or other goods or services in which they could use, or might appear to have the opportunity to use, for personal gain confidential information or special knowledge obtained as a result of their relationship with the University.
6. Each staff or designated faculty member shall refrain from unauthorized disclosure of non-public information concerning the University's intentions, its investments, its property development, sale or acquisition, its purchasing or its contracting activities.
7. No staff or designated faculty member shall make unauthorized use of University resources for his or her personal benefit or for the benefit of any other person.

8. It is sound practice to discourage personal gifts and favors from people with whom the University has a business relationship. Personal gifts of more than nominal value must be tactfully declined or returned to avoid any appearance or suggestion of improper influence. Those staff and designated faculty members involved in the awarding or administration of contracts using federal or other government funds must keep in mind that they are prohibited by law from soliciting or accepting gratuities, favors or anything of monetary value from contractors or potential contractors.

DEFINITIONS

Term	Definition
Conflict of interest	When an individual's financial, professional, or other personal interests could directly or indirectly influence—or appear to influence—their professional judgment in fulfilling USFCA responsibilities.
Consulting	Consulting is an Outside Professional Activity related to a personnel member's field or discipline in which the individual provides services to a third party for a fee or equivalent compensation, acting as an independent contractor (hereinafter referred to as "Consultant"). Consulting arrangements may take various forms, but generally involve personnel applying their professional expertise to advance the goals of an external entity in exchange for compensation or other consideration.
Conflict of Commitment	A Conflict of Commitment generally involves issues of time allocation that create a risk of divided loyalty between USFCA and an external organization. At USFCA, a conflict arises when personnel engage in Outside Professional Activities that exceed permitted limits or when such activities, whether paid or unpaid, interfere with their professional obligations and commitment to the University.
Financial Conflict of Interest	A financial conflict of interest exists when the recipient's designated official(s) reasonably determines that an investigator's significant

	financial interest could directly and significantly affect the design, conduct, or reporting of the PHS-funded research.
Significant Conflict of Interest	anything of monetary value such as salary or other payments, equity interests, and intellectual property rights. For NIH grants, OSP will require the PI and all research assistants and students to complete Financial Conflict of Interest forms to comply with the federal requirement.

ADDITIONAL CONTACTS

Subject	Contact	Phone	Email

FORMS

Form	Use	Location
Annual Conflict of Interest Disclosure	University of San Francisco Annual Conflict of I…	

REVISION HISTORY

__/__/20__ - First publication of Policy.

APPENDICES

Appendix A

Appendix B