

Research and Sponsored Projects Manual (RSP)

RSP 206: Objectivity in Research—Disclosure of Financial Interests and Management of Conflicts of Interest

Effective: 10/1/1995

Revised: 7/1/2026

Purpose

To promote objectivity in research and other sponsored project activities by establishing standards to protect the design, conduct, and reporting of externally funded projects from potential bias by an investigator's conflicting financial interests, all [principal investigators \(PIs\)](#) and co-principal investigators are required to disclose their [significant financial interests](#) (as defined in [RSP 004](#), "Definitions").

Sources

45 *Code of Federal Regulations* Part 94 §§ 1–6

National Science Foundation Award and Administration Guide, Chapter IX.A., Conflict of Interest Policies

Public Health Service Regulation 42 *Code of Federal Regulations* Part 50 Subpart F, Promoting Objectivity in Research

Department of Energy Interim Conflict of Interest Policy Requirement for Federal Assistance, FAL 2022-02

National Aeronautics and Space Administration Grant and Cooperative Agreement Manual (GCAM) Conflicts of Interest Policy (GIC 23-07 August 21, 2023)

Arizona Revised Statutes § 15–1635 and §§ 38–501 through –511

Arizona Board of Regents Policy Manual - 6-908 and 3-901

Knowledge Enterprise (KE)

Applicability

All [investigators](#) conducting [research](#) and/or other sponsored activities at the university with funding from any public or private source outside the university.

Policy

Arizona State University has comprehensive and interrelated policies and guidelines that address the conduct of ASU employees, their interactions with private industry, and disclosure of conflict of interest. The policies work together to set high standards for employees, ensure the integrity of ASU research results, and guide interactions of ASU employees in their partnerships with industry and other university-related activities.

University employees are expected to comply with all federal and state laws and university policies related to conflict of interest, including *Arizona Revised Statutes* §§ 38–501 through –511 and the *Academic Affairs Policies and Procedures Manual*, [ACD 204–08](#), "Conflict of Interest."

The National Science Foundation (NSF) and the Public Health Service (PHS), including the National Institutes of Health (NIH), the National Aeronautics and Space Administration (NASA), and the Department of Energy require all investigators to disclose to their universities every significant financial interest that may present a conflict of interest. All disclosures must be made prior to proposal submission to these sponsors and updated, if necessary, prior to the expenditure of any funds upon receipt of an award. The university requires all investigators to file disclosure statements of financial interest at least annually and when there are changes to previously disclosed financial interests.

For more information and forms, see the companion procedures and information posted at the [KE Office of Research Compliance](#).

Cross-References

For more information about conflict of interest, see:

1. [RSP 604](#), "Ownership of Research Data and Materials & Intellectual Property Management Implementation Policy" and
2. the *Academic Affairs Policies and Procedures Manual*: [ACD 204–08](#), "Conflict of Interest."

For more information about conditions of service at ASU, see:

1. the *Academic Affairs Policies and Procedures Manual*: [ACD 504](#), "Conditions of Administrative Service at ASU" and
2. the *Staff Personnel Policies and Procedures Manual*: [SPP 813](#), "Code of Conduct for Business Activities."