



RESEARCH, GRANTS, AND FOUNDATION RELATIONS

Conflict of Interest and Foreign Influence in Research Policy

Purpose

Pepperdine University is committed to ensuring the integrity of research and complying with federal regulations. This policy establishes standards and procedures for the identification, evaluation, and management or elimination of financial conflicts of interest and concerns related to foreign influence that could potentially affect the design, conduct, or reporting of research.

In accordance with federal regulations, including those of the Public Health Service (PHS) regarding financial conflicts of interest ([42 CFR Part 50, Subpart F](#)), the [National Institutes of Health \(NIH\)](#), the [National Science Foundation \(NSF\)](#), and the [National Security Presidential Memorandum \(NSPM-33\)](#), Pepperdine University has a responsibility to manage, reduce, or eliminate any actual or potential conflicts of interest and address potential risks of undue foreign influence that may arise from an Investigator's financial interests and foreign affiliations.

Disclosure Requirements

Significant Financial Interests: Investigators must disclose any significant financial interest that could reasonably appear to be affected by externally sponsored research. Significant financial interest means anything of monetary value, including (but not limited to):

- Salary or other payments for services (e.g., consulting fees or honoraria);
- Equity interests (e.g., stocks, stock options, or other ownership interests); and
- Intellectual property rights (e.g., patents, copyrights, and royalties from such rights).
Significant financial interest does **not** include:
 - Salary, royalties, or other remuneration from Pepperdine University;
 - An equity interest that, when aggregated for the Investigator and the Investigator's spouse or domestic partner and dependent children, meets both of the following tests:
 - does not exceed \$5,000 in value as determined through reference to public prices or other reasonable measures of fair market value; and
 - does not represent more than a five percent ownership interest in any single entity;
 - Salary, royalties, or other payments that, when aggregated for the Investigator and the Investigator's spouse or domestic partner and dependent children over the next twelve months, are not expected to exceed \$5,000;
 - Income from seminars, lectures, or teaching engagements sponsored by public or nonprofit entities; and
 - Income from service on advisory committees or review panels for public or nonprofit entities.

Foreign Influence and Affiliations: In addition to financial interests, Investigators must disclose information related to foreign affiliations, activities, and funding that may constitute a potential risk of undue foreign influence, as outlined in NSPM-33 and as required by NIH and NSF. This includes, but is not limited to:

1. Participation in foreign government-sponsored talent recruitment programs.
2. Current appointments (including honorary, visiting, adjunct) or positions (paid or unpaid) with foreign governments, institutions, or entities.
3. Funding or resources (financial or in-kind) received directly or indirectly from foreign governments, institutions, or entities.
4. Collaborations with researchers or institutions in foreign countries.
5. Whether the proposed research includes any "foreign components" as defined by NIH.

Timing of Disclosure:

1. Investigators must fully disclose all significant financial interests and information related to foreign influence before the proposal is submitted for external funding.
2. For PHS-funded research (including NIH and CDC), Investigators must submit disclosures as required by PHS regulations, which includes: a disclosure with each grant proposal (even if it is a negative report); and annual disclosure for the duration of the award.
3. If a new significant financial interest or new information regarding foreign influence arises during the period of the award, that interest or information must be disclosed promptly, within thirty (30) days of discovery.

Family Relationships: Investigators must also disclose any family relationship (spouse or domestic partner, and dependent children) between Investigators and persons working with them on sponsored projects.

Compliance Procedures

Investigators must complete the Pepperdine University Financial Interest and Foreign Influence Disclosure Form and submit it to the Office of Research, Grants, and Foundation Relations (RGFR).

All conflicts of interest or potential conflicts of interest, as well as concerns related to foreign influence, must be evaluated and managed or eliminated before any awarded funds can be spent.

Pepperdine University's Institutional Official (as defined in the Policy on PHS/NIH Conflict of Interest in Research, or as otherwise designated by the University) will review disclosures and may require a written plan for managing or mitigating identified conflicts or concerns.

Effective October 10, 2025, NSF requires research security training certifications from proposers and individuals identified as senior/key personnel by the proposer. Proposers may utilize any training that addresses cybersecurity, international collaboration, foreign interference, and rules for proper use of funds, disclosure, conflict of commitment, and conflict of interest. NSF, in partnership with the NIH, DOE, and DoD, is sharing online research security training for the research community. Covered investigators are required to take the research security training [here](#).

Who Is Covered?

"Investigator" means the principal investigator/project director, co-principal investigators, and any other person at the University who is responsible for the design, conduct, or reporting of research, educational, or service activities funded or proposed for funding by an external sponsor.

In this context, the term "Investigator" includes the investigator's spouse or domestic partner and dependent children, as applicable to the disclosure of significant financial interests and foreign affiliations.

What Must Be Disclosed?

Investigators must disclose any significant financial interest that would reasonably appear to be affected by the research or educational activities funded or proposed for funding by an external sponsor, as defined by Pepperdine University policy and applicable federal regulations (e.g., PHS regulations).

Investigators must disclose information related to foreign affiliations, activities, and funding as specified in Section II.B of this policy, to address concerns of undue foreign influence as outlined in NSPM-33 and required by NIH and NSF.

Any significant financial interest in an entity whose financial interests would reasonably appear to be affected by the research or educational activities funded or proposed for funding by an external sponsor.