

UNIVERSITY OF CALIFORNIA, LOS ANGELES



OFFICE OF THE CHANCELLOR

DANIEL NEUMAN
EXECUTIVE VICE CHANCELLOR AND PROVOST

March 12, 2004

To: Investigators and Research Staff
From: Daniel Neuman, Executive Vice Chancellor and Provost
Re: University Policy on Acceptance of Gifts and Gratuities
Cc: Human Research Policy Board

A handwritten signature in black ink, appearing to read "D. Neuman", positioned to the right of the "From:" line.

University policy on acceptance of gifts and gratuities indicates that all employees are expected to act with integrity, to exercise good judgment, and to recognize that accepting personal gifts from parties doing business (or who wish to do business) with the University may evoke the perception of favoritism.

The California Political Reform Act, upon which the policy is based, defines gifts as "any payment for which the recipient does not provide equal or greater consideration in return." Incentive payments offered to those conducting research involving human subjects are a particular form of gift that merits special discussion.

Although University policy does not expressly prohibit acceptance of all gifts, the Human Research Policy Board (HRPB) has determined that acceptance of incentive payments by UCLA employees of enrollment bonuses, finder's fees, or incentive payments in connection with human subject research may give rise to perceptions of conflicts of interest and may appear to affect the judgment of the research team.

Incentive payments, whether from study sponsors or from a Contract Research Organization (CRO), are sometimes offered to encourage the recruitment and enrollment of subjects. They take various forms, including but not limited to personal items or cash, reimbursement of travel not related to the study, gift certificates, and, in some cases, stock and stock options. They may be offered to investigators, research administrators, study coordinators, or other research personnel. Researchers need to inform study sponsors that campus policy will not permit acceptance of incentive payments of any kind.

More detailed information about the University of California Policy and Guidelines Regarding Acceptance of Gifts and Gratuities by Employees Under California's Political Reform Act may be found at (<http://www.ucop.edu/ucophome/coordrev/policy/1-24-01att.pdf>). University of California Staff Personnel Policy on acceptance of gifts can be found at: http://atyourservice.ucop.edu/employees/policies/staff_policies/spp82.html.

Questions about University policy on acceptance of gifts should be addressed to the Office of the Campus Counsel, 3149 Murphy Hall.