

FCOI Disclosure Requirements by Funding Source

STATE LAW (FPCC – Nongovernmental Funding)	FEDERAL POLICY (NSF/USDA Funding)	FEDERAL REGULATIONS (PHS Funding)
REPORTING TRIGGERS		
<ul style="list-style-type: none"> Research contract/grant from a non---governmental entity Research Gifts earmarked for a specific individual or a specific research project Material Transfer Agreement <p><i>Note: Exclude all exempt sponsors on FPCC approved list and all non-profit, tax-exempt educational institutions. However, researchers must disclose for the prime sponsor if the educational institution received its funds from a non-governmental entity.</i></p>	<ul style="list-style-type: none"> NSF/USDA research contract/grant Non-governmental entity which flows down NSF/USDA funds UC Discovery Grant California Institute for Regenerative Medicine (CIRM) Grant UC Special Research Programs (HIV/AIDS, breast cancer and tobacco related disease) <p><i>Note: Exclude Phase 1 SBIR or STTR grants</i></p>	<ul style="list-style-type: none"> PHS research contract/grant from PHS designated agencies within the DHHS Non-governmental entity which flows down PHS funds Research Funding from organizations that follow PHS disclosure requirements (i.e., American Cancer Society, American Heart Association). Complete list at FDP (Federal Demonstration Partnership) website: http://nrc59.nas.edu/pub/fcoi_agencies_phs_regs.html <p><i>Note: Exclude Phase 1 SBIR or STTR grants. List of PHS compliant institutions and entities is available at the FDP site: http://nrc59.nas.edu/pub/fcoi_home.html</i></p>
WHO MUST DISCLOSE?		
CSU Principal Investigator	CSU Investigator(s) – Individuals responsible for the design, conduct, or reporting of the funded research project	CSU Investigator(s) – Individuals responsible for the design, conduct, or reporting of the funded research project
WHAT TO DISCLOSE- FINANCIAL INTEREST		
<p>A financial interest in the non---governmental sponsor of the research including:</p> <ul style="list-style-type: none"> Income ≥ \$500 Investments ≥ \$2,000 Director, Officer, Employee, Partner, Trustee, Consultant or Management position Loan Balances ≥\$500 Personal Gifts Valued at ≥ \$50 Travel Reimbursements 	<p>A significant financial interest related to the research project including:</p> <ul style="list-style-type: none"> Income > \$10,000 Equity (of any type) > \$10,000 or 5% Director, Officer, Employee, Partner, Trustee, Consultant or Management position Intellectual Property 	<p>A significant financial interest related to the investigator’s institutional responsibilities including:</p> <ul style="list-style-type: none"> If publicly traded entity, total value of compensation and equity interest > \$5,000 If non---publicly traded entity, total value of compensation > \$5,000 or any equity interest Income received related to intellectual property > \$5,000 Any reimbursed or sponsored travel (excluding (1) travel that is reimbursed or sponsored by a Federal, state, local government agency, an Institution of higher education as defined by 20 U.S.C. 1001(a), an academic teaching hospital, a medical center, or a research institute affiliated with an Institution of higher education; or (2) sponsored or reimbursed travel for the Investigator’s spouse/registered domestic partner and/or dependent children.)
<i>Note for all sources: Financial interests received within 12 months prior to submission must be reported for the disclosing individual and his/her spouse or registered domestic partner, and dependent children.</i>		
WHEN TO DISCLOSE		
<ul style="list-style-type: none"> With the initial proposal With additional funding <p><i>Note: All positive disclosures must be reviewed and approved prior to acceptance of the award or additional funding.</i></p>	<ul style="list-style-type: none"> With the initial proposal With non-competing continuations With renewals With supplemental funding When new personnel are added With any new significant financial interest (New significant financial interests must be reported within 30 days of acquiring or discovering the new SFI for the disclosing individual and his/her spouse/registered domestic partner and dependent children.) <p><i>Note: All positive disclosures must be reviewed prior to expenditure of funds.</i></p>	<ul style="list-style-type: none"> With the initial proposal With non---competing continuations With renewals With supplemental funding When new personnel are added With any new significant financial interest (New significant financial interests must be reported within 30 days of acquiring or discovering the new SFI for the disclosing individual and his/her spouse/registered domestic partner and dependent children.) <p><i>Note: All positive disclosures must be reviewed and approved prior to expenditure of funds.</i></p>
DISCLOSURE FORMS TO SUBMIT		
<ul style="list-style-type: none"> State Disclosure (Form 700-U) Campus addendum forms, if applicable 	<ul style="list-style-type: none"> CSUSB Federal Disclosure Form Campus addendum forms, if applicable 	<ul style="list-style-type: none"> CSUSB Federal Disclosure Form Campus addendum forms, if applicable
TRAINING REQUIREMENTS		
<ul style="list-style-type: none"> Ethics Training (CSU for University investigators; CITI or campus-based training for auxiliary investigators) 	<ul style="list-style-type: none"> NA 	<ul style="list-style-type: none"> PHS Training and/or campus-based training modules or programs (including CITI FCOI Training and campus in-person training/workshops)