## FCOI Disclosure Requirements by Funding Source

### REPORTING TRIGGERS

<table>
<thead>
<tr>
<th>STATE LAW (FPPC – Nongovernmental Funding)</th>
<th>FEDERAL POLICY (NSF/USDA Funding)</th>
<th>FEDERAL REGULATIONS (PHS Funding)</th>
</tr>
</thead>
</table>
| • Research contract/grant from a non-governmental entity  
  • Research Gifts earmarked for a specific individual or a specific research project  
  • Material Transfer Agreement  
  Note: Exclude all exempt sponsors on FPPC 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. | • 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)  
Note: Exclude Phase 1 SBIR or STTR grants | • 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](http://nrc59.nas.edu/pub/fcoi_agencies_phs_regs.html)  
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](http://nrc59.nas.edu/pub/fcoi_home.html) |

### WHO MUST DISCLOSE?

<table>
<thead>
<tr>
<th>CSU Principal Investigator</th>
<th>CSU Investigator(s) – Individuals responsible for the design, conduct, or reporting of the funded research project</th>
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</tr>
</thead>
</table>

### WHAT TO DISCLOSE - FINANCIAL INTEREST

A financial interest in the non-governmental sponsor of the research including:

- Income ≥ $500  
- Investments ≥ $2,000  
- Director, Officer, Employee, Partner, Trustee, Consultant or Management position  
- Loan Balances ≥ $500  
- Personal Gifts Valued at ≥ $50  
- Travel Reimbursements

A significant financial interest related to the research project including:

- Income > $10,000  
- Equity (of any type) > $10,000 or 5%  
- Director, Officer, Employee, Partner, Trustee, Consultant or Management position  
- Intellectual Property

A significant financial interest related to the investigator’s institutional responsibilities including:

- 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.)

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.

### WHEN TO DISCLOSE

- With the initial proposal  
- With additional funding  

Note: All positive disclosures must be reviewed and approved prior to acceptance of the award or additional funding.

- With the initial proposal  
- When new personnel are added  
- With any change in an investigator’s financial interest  

Note: All positive disclosures must be reviewed and approved prior to acceptance of the award or additional funding.

- 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.)  

Note: All positive disclosures must be reviewed and approved prior to expenditure of funds.

### DISCLOSURE FORMS TO SUBMIT

- State Disclosure (Form 700-U)  
- Campus addendum forms, if applicable  
- CSUSB Federal Disclosure Form  
- Campus addendum forms, if applicable  
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- Campus addendum forms, if applicable

### TRAINING REQUIREMENTS

- Ethics Training (CSU for University investigators; CITI or campus-based training for auxiliary investigators)  
- NA  
- PHS Training and/or campus based training modules or programs (including CITI FCOI Training and campus in-person training/workshops)