FCOI Disclosure Requirements by Funding Source		
STATE LAW	FEDERAL POLICY	FEDERAL REGULATIONS
(FPPC – Nongovernmental Funding)	(NSF/USDA Funding)	(PHS Funding)
REPORTING TRIGGERS		
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	<ul> <li>PHS research contract/grant from PHS designated agencies within the DHHS</li> <li>Non-governmental entity which flows down PHS funds</li> <li>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</li> <li>Note: Exclude Phase 1 SBIR or STTR grants. List of PHS compliant institutions and entities is available at the FDP</li> </ul>
	WHO MUST DISCLOSE?	site: http://nrc59.nas.edu/pub/fcoi_home.html
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		
A financial interest in the non-governmental sponsor of the research including:	A significant financial interest related to the research project including:	A significant financial interest related to the investigator's institutional responsibilities including:
<ul> <li>Income ≥ \$500</li> <li>Investments ≥ \$2,000</li> <li>Director, Officer, Employee, Partner, Trustee, Consultant or Management position</li> <li>Loan Balances ≥\$500</li> <li>Personal Gifts Valued at ≥ \$50</li> <li>Travel Reimbursements</li> </ul>	<ul> <li>Income &gt; \$10,000</li> <li>Equity (of any type) &gt; \$10,000 or 5%</li> <li>Director, Officer, Employee, Partner, Trustee, Consultant or Management position</li> <li>Intellectual Property</li> </ul>	<ul> <li>If publicly traded entity, total value of compensation and equity interest &gt; \$5,000</li> <li>If non-publicly traded entity, total value of compensation &gt; \$5,000 or any equity interest</li> <li>Income received related to intellectual property &gt; \$5,000</li> <li>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.)</li> </ul>
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.	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.	<ul> <li>With the initial proposal</li> <li>With non-competing continuations</li> <li>With renewals</li> <li>With supplemental funding</li> <li>When new personnel are added</li> <li>With any new significant financial interest (New significant financial interest 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.)</li> <li>Note: All positive disclosures must be reviewed and approved prior to expenditure of funds.</li> </ul>
DISCLOSURE FORMS TO SUBMIT		
<ul> <li>State Disclosure (Form 700-U)</li> <li>Campus addendum forms, if applicable</li> </ul>	CSUSB Federal Disclosure Form     Campus addendum forms, if applicable	CSUSB Federal Disclosure Form     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)