FCOI Disclosure Requirements by Funding Source		
STATE LAW	FEDERAL POLICY	FEDERAL REGULATIONS
(<u>FPPC – </u> Nongovernmental	(NSF/USDA/NASA Funding)	(PHS/DOE* Funding)
Funding)		
	REPORTING TRIGGERS	
Research contract/grant	NSF/USDA/NASA research	PHS research contract/grant from
from a nongovernmental	contract/grant	PHS/DOE* agencies within the DHHS/DOE
entity	Non-governmental entity	Non-governmental entity flows down from
 Research Gifts earmarked for a specific individual or a 	which flows down NSF/USDA/NASA funds	PHS/DOE funds
specific research project	UC Discovery Grant	Research Funding from organizations that follow PHS disclosure requirements. Complete list
Material Transfer Agreement	California Institute for	at FDP (Federal Demonstration Partnership) below.
	Regenerative Medicine	- PHS policy excludes Phase 1 SBIR/STTR
Note: Exclude all exempt sponsors on	(CIRM) Grant	grants. List of PHS compliant institutions and
<u>FPPC approved list</u> and all nonprofit, tax	UC Special Research Programs	entities is available at the FDP site:
exempt educational institutions. However, researchers must disclose for the prime	(HIV/AIDS, breast cancer and	https://thefdp.org/default/fcoi- clearinghouse/fcoi-agencies/
sponsor if the educational institution	tobacco related disease)	
received its funds from a non-governmental	Note: Exclude Phase 1 SBIR or STTR grants	*DOE – Department of Energy
entity.		
	WHO MUST DISCLOS	
CSU Principal Investigator	CSU Investigator(s) – Individuals	CSU Investigator(s) – Individuals responsible for the
	responsible for the design, conduct, or	design, conduct, or reporting of the funded research
	or reporting of the funded research project	project
	WHAT TO DISCLOSE FINANCIAL II	NTEREST
For non-governmental sponsors		
(direct sponsor or prime funding sources)	A significant financial interest related to the research project including	investigator's institutional responsibilities
	to the research project including Income > \$10,000	including:
REQUIRED FOR RESEARCH PROJECTS	 Equity (of any type) > \$10,000 or 5% 	 If publicly traded entity, total value of
A financial interact in the new governmental	 Director, Officer, Employee, 	compensation and equity interest
A financial interest in the non-governmental sponsor of the research including:	Partner, Trustee, Consultant	when aggregated > \$5,000 • If nonpublicly traded entity, total value of
sponsor of the research including.	or Management position	compensation > \$5,000 or any equity interest
• Income ≥ \$500	Intellectual Property	 Income received related to intellectual property
 Investments ≥ \$2,000 		>\$5000Any reimbursed or sponsored travel
Director, Officer, Employee, Partner, Trustee, Consultant		(excluding (1) travel that is reimbursed or sponsored
or Management position		by a Federal, state, local government agency, an
 Loan Balances ≥\$500 		Institution of higher education as defined by 20 U.S.C. 1001(a), an academic teaching hospital, a
 Personal Gifts Valued at ≥ \$50 		medical center, or a research institute affiliated with
 Travel Reimbursements 		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: Fina	ancial 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 award	With the initial proposal	 With the initial proposal
 With additional funding 	 With noncompeting continuations With renewals 	With noncompeting continuations
With renewals	• With supplemental funding	• With renewals
With any new reportable financial	When new personnel are added	With supplemental funding When new personnel are added
interest(s)	 With any new reportable financial 	 When new personnel are added With any new reportable financial interest(s)
Note: All positive disclosures must be	interest(s)	
reviewed and approved prior to acceptance	New significant financial interests must be	New significant financial interests must be reported within
of the award or additional funding.	reported within 30 days of acquiring or	30 days of acquiring or discovering the new SFI for the
	discovering the new SFI for the disclosing	disclosing individual and his/her spouse/registered
	individual and his/her spouse/registered	domestic partner and dependent children.
	domestic partner and dependent children.)	Note: All positive disclosures must be reviewed and
	Note: All positive disclosures must be reviewed	approved prior to expenditure of funds.
	prior to expenditure of funds.	
	DISCLOSURE FORMS TO SUB	MIT
 State Disclosure (Form 700U) 	CSUSB Federal Disclosure Form	CSUSB Federal Disclosure Form
 Campus addendum forms, if applicable 	Campus addendum forms, if applicable	 Campus addendum forms, if applicable
	TRAINING REQUIREMENTS	
- Ethics Training (COUL for University	NA NA	PHS/DOE Training and/or campus-based training
Ethics Training (CSU for University investigators; CITI or campus-based		 PHS/DOE Training and/or campus-based training modules or programs (including CITI FCOI Training
training for auxiliary investigators)		and campus in-person training/workshops)
training for auxiliary investigators)		