

FCOI Disclosure Requirements by Funding Source

STATE LAW (FPPC – Nongovernmental Funding)	FEDERAL POLICY (NSF/USDA Funding)	FEDERAL REGULATIONS (PHS/DOE* 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>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.</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>Note: Exclude Phase 1 SBIR or STTR grants</p>	<ul style="list-style-type: none"> • PHS research contract/grant from PHS/DOE* agencies within the DHHS/DOE • Non-governmental entity flows down from PHS/DOE funds • Research Funding from organizations that follow PHS disclosure requirements. Complete list at FDP (Federal Demonstration Partnership) below. <ul style="list-style-type: none"> - PHS policy excludes Phase 1 SBIR/STTR grants. List of PHS compliant institutions and entities is available at the FDP site: https://thefdp.org/default/fcoi-clearinghouse/fcoi-agencies/ <p>*DOE – Department of Energy</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 	<ul style="list-style-type: none"> • 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 	<ul style="list-style-type: none"> • A significant financial interest related to the investigator's institutional responsibilities including • If publicly traded entity, total value of compensation and equity interest when aggregated > \$5,000 • If non---publicly traded entity, total value of compensation > \$5,000 or any equity interest • Income received related to intellectual property >\$5000Any 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.)
<p>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.</p>		
WHEN TO DISCLOSE		
<ul style="list-style-type: none"> • With the initial proposal • With additional funding • With renewals • With any new reportable financial interest(s) <p>Note: All positive disclosures must be reviewed and approved prior to acceptance of the award or additional funding.</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 reportable financial interest(s) <p>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> <p>Note: All positive disclosures must be reviewed prior to expenditure of funds.</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 reportable financial interest(s) <p>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> <p>Note: All positive disclosures must be reviewed and approved prior to expenditure of funds.</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/DOE Training and/or campus-based training modules or programs (including CITI FCOI Training and campus in--person training/workshops)