## FCOI Disclosure Requirements by Funding Source

<table>
<thead>
<tr>
<th>STATE LAW (FPPC – Nongovernmental Funding)</th>
<th>FEDERAL POLICY (NSF/USDA Funding)</th>
<th>FEDERAL REGULATIONS (PHS/DOE* Funding)</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>REPORTING TRIGGERS</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td>• Research contract/grant from a non–governmental entity</td>
<td>• NSF/USDA research contract/grant from PHS/DOE* agencies within the DHHS/DOE</td>
<td></td>
</tr>
<tr>
<td>• Research Gifts earmarked for a specific individual or a specific research project</td>
<td>• Non-governmental entity which flows down NSF/USDA funds</td>
<td>• Non-governmental entity flows down from PHS/DOE funds</td>
</tr>
<tr>
<td>• Material Transfer Agreement</td>
<td>• UC Discovery Grant</td>
<td>• Research Funding from organizations that follow PHS disclosure requirements. Complete list at FDP (Federal Demonstration Partnership) below.</td>
</tr>
<tr>
<td></td>
<td>• California Institute for Regenerative Medicine (CIRM) Grant</td>
<td>- PHS policy excludes Phase 1 SBIR/STTR grants. List of PHS compliant institutions and entities is available at the FDP site: <a href="https://thefdp.org/default/fcoi-cleaninghouse/fcoi-agencies/">https://thefdp.org/default/fcoi-cleaninghouse/fcoi-agencies/</a></td>
</tr>
<tr>
<td>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.</td>
<td>• UC Special Research Programs (HIV/AIDS, breast cancer and tobacco related disease)</td>
<td>*DOE – Department of Energy</td>
</tr>
</tbody>
</table>

### 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

**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 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 > $5000
- 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
- With renewals
- With any new reportable financial interest(s)

**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
- 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/DOE Training and/or campus-based training modules or programs (including CITI FCOI Training and campus-in-person training/workshops)

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

---

*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

**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 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 > $5000
- 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
- With renewals
- With any new reportable financial interest(s)

**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
- 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/DOE Training and/or campus-based training modules or programs (including CITI FCOI Training and campus-in-person training/workshops)

---